



UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

April 2021 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

CR No. 18-00173 (A) -GW

F I R S T
S U P E R S E D I N G
I N D I C T M E N T

JOSE LANDA-RODRIGUEZ,
aka "Jose Rodriguez-Landa,"
aka "Jose Landa,"
aka "Jose Rodriguez,"
aka "Fox,"
aka "Fox Tapia,"
aka "F-X,"
aka "Alejandro Tapia,"
aka "Cola Rojo,"
aka "Red Tail,"
aka "Pops,"
aka "Tio,"
aka "The General,"
aka "Taras,"
aka "The Old Man,"
aka "The Animal,"
aka "Old School,"
GABRIEL ZENDEJAS-CHAVEZ,
aka "Corbatas,"
RAFAEL LEMUS,
aka "Ere,"
aka "The Voice,"
aka "La Voz,"
ALVINO MUNOZ,
aka "Bino,"
aka "B,"
HECTOR DUARTE,
aka "Lil Man,"
aka "Hecko,"

[18 U.S.C. § 1962(d): Racketeer Influenced and Corrupt Organizations Conspiracy; 18 U.S.C. §§ 1959(a)(1), (3), (5): Violent Crimes in Aid of Racketeering Activity; 21 U.S.C. § 846: Conspiracy to Distribute and Possess With Intent to Distribute Controlled Substances; 21 U.S.C. §§ 841(a)(1), (b)(1)(B), (b)(1)(C): Possession with Intent to Distribute Controlled Substances; 18 U.S.C. § 1956(a)(1)(A)(i): Money Laundering; 18 U.S.C. § 1029(a)(3): Possession of at Least Fifteen Access Devices; 18 U.S.C. § 1028A(a)(1): Aggravated Identity Theft; 18 U.S.C. § 2: Aiding and Abetting and Causing an Act to Be Done; 18 U.S.C. §§ 1963, 982, and 1029, and, 21 U.S.C. § 853: Criminal Forfeiture]

SAMANTHA RIVERA,
aka "Sam,"
aka "S,"
MARK LANDEROS,
aka "Smokey,"
aka "Troy,"
aka "Hot,"
CECILIA VIRGEN,
aka "Cecilia DeLeon,"
aka "Sessy,"
aka "Hazel,"
aka "Gia,"
aka "Sky,"
aka "Hooker,"
NANCY DUARTE,
aka "Pink,"
VALENTIN CORDOVA,
aka "Teen,"
DAVID BERNARDINO,
aka "Downer,"
MIRIAM MEZA,
ANA MARTINEZ,
aka "Ana America,"
aka "Bandit,"
ADRIAN ARAIZA,
aka "Chemo,"
DAVID DIAZ,
aka "Stomps,"
ROBERT RAMIREZ,
aka "Wiz,"
JUAN LEONARD GARCIA,
aka "Little John,"
aka "Trevor,"
BRYANNA MCCULLAH,
aka "Bee Bee," and
JUAN NMN GARCIA,
aka "Trouble,"

Defendants.

The Grand Jury charges:

GENERAL ALLEGATIONS

A. HISTORY AND STRUCTURE OF THE MEXICAN MAFIA

1. The Mexican Mafia, also known as "La Eme," is a "gang of gangs" comprised mostly of senior members of southern California Hispanic street gangs who have come together to control and profit from the activities of Hispanic gangs operating in southern

1 California. La Eme was established in the 1950s by Hispanic youth
2 inmates at the Duell Vocational Facility, but over the decades has
3 morphed into an international criminal organization. Today, there
4 are approximately 140 full members of the Mexican Mafia, referred to
5 as "carnales" or "brothers." The majority of Mexican Mafia members
6 are incarcerated in California prisons or jails or in federal
7 prisons. By exercising control over inmates in the prison and jail
8 systems, primarily through violence and threats of violence, the
9 Mexican Mafia is able to control the activities of southern
10 California Hispanic criminal street gangs, both inside and outside
11 custody facilities. Mexican Mafia members and associates wield such
12 power over the prison and jail populations that they are able to
13 order that acts of violence be carried out not only against other
14 prison or jail inmates, but also against street gang members and
15 others outside of prison or jail.

16 2. Members of the Mexican Mafia have divided control of, and
17 the rights to criminal proceeds from, nearly all penal facilities in
18 California, including state prison and county jail systems.
19 Similarly, members of the Mexican Mafia have divided the rights to
20 criminal proceeds from the activities of southern California Hispanic
21 criminal street gangs in various southern California neighborhoods.

22 3. Generally, one member of the Mexican Mafia has control of
23 and rights to a specific facility. That member, whether incarcerated
24 in that facility or not, will control the smuggling of drugs into the
25 facility, the collection of taxes from the sale of those drugs,
26 extortion within that facility (including the kitty and other fines
27 discussed below), and the maintenance of discipline within the
28

1 facility. In some cases, different members of the Mexican Mafia may
2 control different parts of the same facility.

3 4. Similarly, members of the Mexican Mafia have divided
4 control of and the rights to "taxes," or a share of criminal proceeds
5 from criminal activities including drug trafficking, from nearly all
6 Hispanic gangs in southern California. Generally, one member of the
7 Mexican Mafia has control of and rights to a specific area; that
8 Mexican Mafia member will control the sale of drugs within that area,
9 the collection of taxes from that area, and the maintenance of
10 discipline over gang members from that area.

11 5. The division of control of custody facilities and
12 neighborhoods is generally agreed upon by the members of the Mexican
13 Mafia, although there are occasionally disputes among members as to
14 the division. Once a Mexican Mafia member acquires control of a
15 custody facility or neighborhood, he can generally operate that
16 custody facility or neighborhood without interference from other
17 members. The Mexican Mafia member in control of a custody facility
18 or neighborhood will put together a team of trusted associates to
19 control the custody facility or neighborhood.

20 6. The Mexican Mafia is split into two major subgroups,
21 "State" and "Federal." A State Mexican Mafia member can control
22 state prisons, southern California jails, and southern California
23 neighborhoods, but generally not federal facilities. A Federal
24 Mexican Mafia member can control federal facilities anywhere in the
25 country, and southern California neighborhoods, but usually cannot
26 control a state prison or a county jail.

27 7. To become a Mexican Mafia member, a Hispanic gang member
28 generally must have a distinguished reputation for "putting in work"

1 on behalf of the Mexican Mafia, meaning the gang member has murdered
2 or assaulted enemies and rivals of Mexican Mafia members.
3 Prospective members are also expected to have provided financial
4 assistance to Mexican Mafia members, and to have followed the Mexican
5 Mafia rules that govern the streets or correctional institutions.

6 8. Mexican Mafia members carry out their criminal activity
7 with the help of associates. Some of these trusted associates act as
8 "shot-callers," that is, high-level associates who have been given
9 the authority to conduct affairs of the Mexican Mafia, such as
10 collecting extortion and drug money and enforcing discipline in their
11 particular areas of control. A "facilitator" is the highest level
12 shot-caller and works directly under the authority of the Mexican
13 Mafia member who appointed him. The facilitator coordinates the
14 activities of the other shot-callers and is responsible for ensuring
15 that other shot-callers carry out the Mexican Mafia member's orders
16 in their area of responsibility, whether in a neighborhood or a
17 custody facility.

18 9. Members of Hispanic street gangs in southern California are
19 referred to as "Surenos" and fall under the control of the Mexican
20 Mafia. "Surenos" may also be referred to as "Southsiders."
21 Additionally, the Mexican Mafia considers Mexican nationals, referred
22 to as "Paisas," and Hispanic-American citizens who are not members of
23 a gang, generally referred to as "Residents," to fall under the
24 Mexican Mafia's control while in a custody facility, and trusted
25 Residents and Paisas may participate in or be given shot-caller
26 positions in Mexican Mafia affairs.

27 10. Members and associates of street gangs controlled by and/or
28 affiliated with the Mexican Mafia must pay "taxes" to members and

1 associates of the Mexican Mafia for permission to maintain control
2 over their territories in order to distribute drugs and engage in
3 other criminal activity. This system of "taxation" amounts to
4 widespread extortion. These "taxes" also ensure the protection of
5 the gang's members once they enter prisons or jails. The "taxing"
6 and control applies to activities both in and out of jail or prison.
7 Indeed, a jail or prison, or a floor, yard, or other unit of a jail
8 or prison is considered by the Mexican Mafia to be territory just as
9 much as a neighborhood.

10 11. Surenos, whether in a custody facility or in a
11 neighborhood, operate as soldiers or workers for the Mexican Mafia.
12 Indeed, being loyal to the Mexican Mafia is an integral part of being
13 a southern California Hispanic street gang member, and it is openly
14 understood that when individuals join such gangs that they are
15 joining an entity loyal to the Mexican Mafia. Members of such gangs
16 are expected to, and are proud to, carry out the orders of the
17 Mexican Mafia member in control of their neighborhood or custody
18 facility, because doing work for the Mexican Mafia increases the gang
19 member's status and reputation. Some gangs proudly include in their
20 name the number "13," denoting the letter M, or "eme" in Spanish, in
21 order to demonstrate the gang's loyalty and allegiance to the Mexican
22 Mafia.

23 B. THE MEXICAN MAFIA'S ORGANIZATION WITHIN THE LOS ANGELES COUNTY
24 JAIL SYSTEM

25 12. The Los Angeles County Jail System ("LACJ" or "the System")
26 is operated by the Los Angeles County Sheriff's Department ("LASD")
27 and receives moneys from the United States Department of Homeland
28 Security and other federal agencies. The system includes various

1 men's facilities including Men's Central Jail ("MCJ"), the Twin
2 Towers Correctional Facility ("Twin Towers"), the Inmate Reception
3 Center ("IRC"), the North County Correctional Facility ("NCCF"),
4 Pitchess Detention Center-North Facility ("Pitchess North"), Pitchess
5 Detention Center-East Facility ("Pitchess East"), and Pitchess
6 Detention Center-South Facility ("Pitchess South"). On any given
7 day, the System houses approximately 15,000 inmates.

8 13. At any time, one Mexican Mafia member may exercise control
9 over the entire LACJ system, or control of various facilities within
10 the System may be divided among different members of the Mexican
11 Mafia. The Mexican Mafia member in charge of an LACJ custody
12 facility maintains control over the facility with the assistance of
13 trusted shot-callers, facilitators, and associates. These Mexican
14 Mafia members and associates, working together to control criminal
15 activity within LACJ, have become their own entity or enterprise and
16 effectively function as an illegal government within LACJ custody
17 facilities ("the Mexican Mafia LACJ Enterprise").

COUNT ONE

[18 U.S.C. § 1962(d)]

[DEFENDANTS JOSE LANDA-RODRIGUEZ, GABRIEL ZENDEJAS-CHAVEZ, RAFAEL LEMUS, ALVINO MUNOZ, HECTOR DUARTE, SAMANTHA RIVERA, MARK LANDEROS, CECILIA VIRGEN, NANCY DUARTE, VALENTIN CORDOVA, DAVID BERNARDINO, MIRIAM MEZA, ANA MARTINEZ, ADRIAN ARAIZA, AND DAVID DIAZ]

1. Paragraphs 1 through 13 of the General Allegations of this First Superseding Indictment are re-alleged and incorporated by reference as if fully set forth herein.

A. THE RACKETEERING ENTERPRISE

2. At all times relevant to this First Superseding Indictment, defendants JOSE LANDA-RODRIGUEZ, also known as ("aka") "Jose Rodriguez-Landa," aka "Jose Landa," aka "Jose Rodriguez," aka "Fox," aka "Fox Tapia," aka "F-X," aka "Alejandro Tapia," aka "Cola Rojo," aka "Red Tail," aka "Pops," aka "Tio," aka "The General," aka "Taras," aka "The Old Man," aka "The Animal," aka "Old School," GABRIEL ZENDEJAS-CHAVEZ, aka "Corbatas," RAFAEL LEMUS, aka "Ere," aka "The Voice," aka "La Voz," ALVINO MUNOZ, aka "Bino," aka "B," HECTOR DUARTE, aka "Lil Man," aka "Hecko," SAMANTHA RIVERA, aka "Sam," aka "S," MARK LANDEROS, aka "Smokey," aka "Troy," aka "Hot," CECILIA VIRGEN, aka "Cecilia DeLeon," aka "Sessy," aka "Hazel," aka "Gia," aka "Sky," aka "Hooker," NANCY DUARTE, aka "Pink," VALENTIN CORDOVA, aka "Teen," DAVID BERNARDINO, aka "Downer," MIRIAM MEZA, ANA MARTINEZ, aka "Ana America," aka "Bandit," ADRIAN ARAIZA, aka "Chemo," and DAVID DIAZ, aka "Stomps," and others known and unknown to the Grand Jury, were members and associates of an organization engaged in, among other things, acts involving murder, kidnapping, robbery, extortion, trafficking in controlled substances, witness

1 tampering, money laundering, and identity theft. At all relevant
2 times, this organization, hereinafter the "Mexican Mafia LACJ
3 Enterprise," operated within the Central District of California and
4 elsewhere. The Mexican Mafia LACJ Enterprise, including its leaders,
5 members, and associates, constitutes an "enterprise," as defined by
6 Title 18, United States Code, Section 1961(4), that is, a group of
7 individuals associated in fact, although not a legal entity, which is
8 engaged in, and the activities of which affect, interstate and
9 foreign commerce. The Mexican Mafia LACJ Enterprise constitutes an
10 ongoing organization whose members function as a continuing unit for
11 a common purpose of achieving the objectives of the enterprise.

12 3. The Mexican Mafia LACJ Enterprise operates for the benefit
13 of the Mexican Mafia member or members deemed by the Mexican Mafia to
14 be in control of LACJ. The Mexican Mafia LACJ Enterprise conducts
15 its activities within LACJ facilities and in some surrounding
16 neighborhoods by imposing the rules of the Mexican Mafia on inmates
17 within LACJ facilities and on members of predominantly Hispanic
18 street gangs. Using the methods of the Mexican Mafia, the Mexican
19 Mafia LACJ Enterprise carries out its goals of controlling drug
20 trafficking activities and the distribution of drug trafficking
21 proceeds, extortion, and the enforcement of Mexican Mafia rules both
22 inside and outside LACJ facilities.

23 4. The Mexican Mafia LACJ Enterprise operates to carry out the
24 goals and objectives of the Mexican Mafia within LACJ custody
25 facilities and in some surrounding neighborhoods, including by
26 directing and controlling drug trafficking activities and the
27 distribution of drug trafficking proceeds, extortion, as well as the
28 enforcement of Mexican Mafia rules (which are used as a basis for

1 extortion), both inside and outside the LACJ custody facilities.

2 More specifically:

3 a. The Mexican Mafia LACJ Enterprise keeps track of
4 southern California Hispanic gang members through lists known as
5 "roll calls," made to keep track of every Sureno in a particular
6 module or dorm, often including the inmate's name, booking number,
7 next court date, gang, and/or moniker. This enables the Mexican
8 Mafia LACJ Enterprise to track down persons in bad standing, to
9 coordinate the movement of drugs and kites, to account for kitty
10 revenue, and other enterprise business.

11 b. Mexican Mafia LACJ Enterprise members and associates
12 in prisons or jails send instructions to local street gangs and other
13 Mexican Mafia members and associates, both inside and outside prison
14 and jail, via telephone calls, prison system e-mails, letters,
15 "kites" (which are notes smuggled by prisoners), "verbals" (passing a
16 particularly sensitive message verbally from inmate to inmate), and
17 by conveying messages through jail or prison visitors. Mexican Mafia
18 LACJ Enterprise members and associates generally use coded language
19 in order to conceal the true nature of their discussions with and
20 instructions to criminal associates. In order to pass on
21 instructions and information from prison and jail, Mexican Mafia LACJ
22 Enterprise members and associates generally rely on associates, often
23 female, known as "secretaries," who communicate with incarcerated
24 Mexican Mafia members and associates and relay their instructions to
25 others. In addition, attorneys who are willing to assist in the
26 Mexican Mafia's criminal activities are utilized by the Mexican Mafia
27 LACJ Enterprise to pass messages concerning these activities and to
28 facilitate communication among its members and associates. These

1 attorneys are particularly valued by members of the Mexican Mafia
2 LACJ Enterprise because they provide a means to shield criminal
3 communications from law enforcement by providing the appearance of
4 attorney-client privilege and a veneer of legitimacy to their
5 criminal communications. Both secretaries and attorneys are treated
6 as respected criminal figures by members of street gangs controlled
7 by and/or affiliated with the Mexican Mafia LACJ Enterprise.

8 c. Another method of communication employed by the
9 Mexican Mafia LACJ Enterprise is telephone calls made with "burnout"
10 phones. Burnout phones are phones that use landline service opened
11 with stolen identities. The Mexican Mafia LACJ Enterprise uses
12 burnout phones to make collect calls from prisons and jails to
13 associates on the outside until the telephone company realizes the
14 account is fraudulent and shuts the line off.

15 d. The Mexican Mafia LACJ Enterprise commonly extorts
16 money from gang members and associates who violate enterprise rules
17 and from those who want to engage in profitable activities in areas
18 controlled by the Mexican Mafia LACJ Enterprise. If the gang member
19 or associate does not pay the demanded sum, or has violated Mexican
20 Mafia or enterprise rules, a Mexican Mafia leader commonly will order
21 that the person be assaulted until that individual complies.
22 Alternatively, if the non-compliant individual refuses to pay, or if
23 the enterprise is not able to punish the individual, the Mexican
24 Mafia LACJ Enterprise may extort or punish family members, close
25 associates, members of that person's gang, or others related to the
26 person. If a person or gang does not meet the Mexican Mafia LACJ
27 Enterprise's payment demands, they will be subjected to violence
28 until they comply.

1 e. One of the Mexican Mafia LACJ Enterprise's most
2 effective ways of extorting or taxing gang members and other Hispanic
3 inmates in jail or prison is through the "kitty." Once a week, in
4 every module of the Los Angeles County Jail system, inmates are
5 allowed to purchase items from the LASD-operated store or commissary.
6 These items include candy bars, soup, ramen noodles, shower shoes,
7 deodorant, baby powder, and other food and personal hygiene items.
8 In every jail module controlled by the Mexican Mafia LACJ Enterprise,
9 every Hispanic gang member, Paisa, or Resident is required to
10 contribute commissary items of a certain value (e.g., one dollar's
11 worth of items) into the kitty for every set amount of items
12 purchased (e.g., fifteen dollars' worth). The Mexican Mafia member
13 in control of the module sets the contribution rates for the kitty,
14 and the module shot-caller collects the commissary items and sells
15 them to a person in the module for a price that is also set by the
16 Mexican Mafia member. The payment for the kitty is made to a
17 secretary or facilitator outside of the facility, who forwards it to
18 the Mexican Mafia member who controls that facility.

19 f. The Mexican Mafia LACJ Enterprise also makes money by
20 controlling the sales of drugs. On the streets, profiting from drug
21 trafficking takes the form of "taxing" drug dealers. All drug
22 dealers in an area controlled by the Mexican Mafia LACJ Enterprise
23 must pay a percentage of their profits from the sale of drugs to the
24 enterprise. If the drug dealer does not pay, he will not be allowed
25 to sell drugs in that area, under threat of assault or even death.
26 If the drug dealer does pay the tax, the drug dealer benefits by
27 receiving protection from other dealers or robbers and gains
28 assistance in collecting debts.

1 g. Inside of custody facilities, the taxing of drug
2 trafficking takes two forms. First, Mexican Mafia members, shot-
3 callers, and associates will arrange for drugs to be smuggled to them
4 inside the Los Angeles County Jail System. Once the Mexican Mafia
5 member or his trusted shot-caller or facilitator within a facility
6 receives the drugs, he will direct their sale within the Los Angeles
7 County Jail system with the proceeds benefiting the member in control
8 of that facility. Furthermore, others within the facility will not
9 be allowed to sell their own drugs until the Mexican Mafia member's
10 drugs have been sold. Second, the Mexican Mafia's control of drug
11 trafficking is maintained by collecting a "thirds" tax on all other
12 drugs that are smuggled into the Los Angeles County Jail system.
13 Pursuant to the thirds tax, one third of each shipment of drugs that
14 is smuggled into the Los Angeles County Jail system must be "broken-
15 off" and given to the Mexican Mafia member in control of the facility
16 or his trusted shot-caller or facilitator. If the Mexican Mafia
17 member decides to sell the "thirds-tax" portion of the drugs, they
18 are sent to a dorm or module for sale with the proceeds going to the
19 Mexican Mafia member, and others in the facility are not allowed to
20 sell drugs until the Mexican Mafia member's thirds have been sold.

21 h. The Mexican Mafia LACJ Enterprise does not limit its
22 extortion to the sale of drugs and the operation of the kitty. The
23 enterprise may subject any person or inmate in a Mexican Mafia LACJ
24 Enterprise controlled neighborhood, facility, or module to extortion
25 for any money-generating activity he or she engages in while in the
26 enterprise controlled territory.

27 i. The Mexican Mafia LACJ Enterprise has self-imposed
28 rules handed down by the Mexican Mafia. These rules, referred to as

1 "reglas," are imposed to maintain fear and compliance among Surenos.
2 Because these rules provide a basis for being fined as well as
3 assaulted, they are a key part of the Mexican Mafia LACJ Enterprise's
4 extortion scheme. If a southern California Hispanic gang member
5 should break one of these rules, discipline is imposed by a
6 facilitator, shot-caller, or secretary of the Mexican Mafia member in
7 control of the facility. Such discipline is frequently imposed in
8 the form of a fine or an assault. Assaults are often referred to as
9 "13 Seconds," "26 Seconds," or "39 Seconds." The premise underlying
10 these punishments is that a person who breaks an enterprise rule
11 should be punished by beatings for either 13 seconds, or for a
12 multiple of 13 seconds. Thirteen seconds is a less severe form of
13 punishment that usually involves two individuals assaulting the
14 offender for thirteen seconds. Thirty-nine seconds is a more severe
15 form of punishment that involves three (or in some cases more)
16 individuals assaulting the offender for 39. Thirty-nine seconds can
17 have different variations. For example, thirty-nine seconds could be
18 issued in the form of three 13-second assaults on the same day
19 (sometimes referred to as "breakfast, lunch, and dinner") or it could
20 be one 39-second assault. A 39-second punishment where three
21 individuals assault an offender for 39 consecutive seconds is also
22 commonly referred to as a "smash out" because the offender is usually
23 moved out of the area after the assault for his own safety by prison
24 or jail personnel. Finally, "sopas," the Spanish word for "soups,"
25 is another common term for an assault.

26 j. One of the most important rules for which discipline
27 may be imposed by the Mexican Mafia LACJ Enterprise is a prohibition
28 on cooperating with law enforcement.

1 k. Another important rule of the Mexican Mafia that is
2 enforced within the Mexican Mafia LACJ Enterprise is that any inmate
3 who is in custody for a sex offense is to be assaulted on sight.
4 After the sex offender is assaulted, the Mexican Mafia then extorts
5 payment from the sex offender in exchange for the Mexican Mafia's
6 agreement that there will be no further assaults.

7 l. The most serious form of discipline is being put on
8 the "green light list" or being "greenlighted." Being placed on the
9 green light list means that every Sureno is obligated to severely
10 assault the person, even if death is likely to result. Only
11 true/full members of the Mexican Mafia can put a person, group, or
12 entire gang on the green light list. Those who are put on a green
13 light list can be removed by the payment of a hefty fine.

14 B. PURPOSES OF THE ENTERPRISE

15 5. The purposes of the Mexican Mafia LACJ Enterprise include,
16 but are not limited to, the following:

17 a. Enriching members and associates of the Mexican Mafia
18 LACJ Enterprise through, among other things, the control of and
19 participation in the distribution of controlled substances both
20 within LACJ and in Mexican Mafia-controlled territories outside of
21 LACJ, extortion of others engaged in the distribution of controlled
22 substances and other crimes within and outside of LACJ, and extortion
23 of inmates within LACJ.

24 b. Maintaining control and authority over LACJ, often
25 through threats, intimidation, and acts of violence against LACJ
26 inmates.

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28 //

1 c. Maintaining control and authority over LACJ in order
2 to maintain general Mexican Mafia discipline and to ensure that the
3 rules and orders are obeyed.

4 d. Promoting and enhancing the Mexican Mafia LACJ
5 Enterprise's members and associates and their activities.

6 e. Punishing Mexican Mafia members and associates who do
7 not comply with the rules and orders of the Mexican Mafia in general,
8 including and especially those who cooperate with law enforcement.

9 C. MEANS AND METHODS OF THE ENTERPRISE

10 6. The means and methods by which the defendants and their
11 associates conduct and participate in the conduct of the affairs of
12 the Mexican Mafia LACJ Enterprise include the following:

13 a. Engaging in drug trafficking, including the smuggling
14 of controlled substances into LACJ, as a means to generate income.

15 b. Engaging in extortion, including the operation of the
16 kitty within LACJ, and including fines for violations of Mexican
17 Mafia rules, as a means to generate income.

18 c. Working together to collect a portion of the proceeds
19 of drug trafficking conducted by others both outside of LACJ and
20 inside of LACJ, such as through the thirds tax, as a means to
21 generate income.

22 d. Committing, attempting to commit, and threatening to
23 commit acts of violence to protect and expand the enterprise's
24 criminal operation, including assaults, murders, acts of
25 intimidation, and threats of violence directed against rival gang
26 members, witnesses to the Mexican Mafia LACJ Enterprise's criminal
27 conduct, and Mexican Mafia members and associates who do not follow
28 the rules and orders of the Mexican Mafia in general.

1 e. Promoting a climate of fear, particularly among rival
2 gang members, potential witnesses to the enterprise's criminal
3 conduct, Hispanic gang members, Paisas, or others who may cooperate
4 with law enforcement within LACJ and throughout southern California,
5 through acts of violence and threats to commit acts of violence.

6 f. Engaging in the aforementioned criminal activity in
7 the presence of other Mexican Mafia LACJ Enterprise members or
8 associates in order to enhance the status of those affirmatively
9 conducting the criminal acts, and committing the aforementioned
10 criminal activity for the purpose of earning the respect of Mexican
11 Mafia LACJ Enterprise members in the hope of achieving higher status.

12 g. In the case of more senior members of the Mexican
13 Mafia LACJ Enterprise and their designated assistants, including
14 secretaries, shot-callers, and facilitators, providing instructions
15 to junior members and associates regarding distribution of controlled
16 substances, including smuggling controlled substances into LACJ,
17 collection of drug and extortion proceeds, commission of acts of
18 violence, commission of fraud and identity theft, and providing
19 verification that such crimes have occurred.

20 h. In the case of more junior members and associates of
21 the Mexican Mafia LACJ Enterprise, engaging in the smuggling of
22 controlled substances into LACJ, carrying out assaults in LACJ and
23 elsewhere, and committing fraud and identity theft, all on the orders
24 of more senior members and associates.

25 D. OBJECT OF THE CONSPIRACY

26 7. Beginning on a date unknown, and continuing until at least
27 March 29, 2018, in Los Angeles and San Bernardino Counties, within
28 the Central District of California, and elsewhere, defendants JOSE

1 LANDA-RODRIGUEZ, GABRIEL ZENDEJAS-CHAVEZ, RAFAEL LEMUS, ALVINO MUNOZ,
2 HECTOR DUARTE, SAMANTHA RIVERA, MARK LANDEROS, CECILIA VIRGEN, NANCY
3 DUARTE, VALENTIN CORDOVA, DAVID BERNARDINO, MIRIAM MEZA, ANA
4 MARTINEZ, ADRIAN ARAIZA, and DAVID DIAZ, and others known and unknown
5 to the Grand Jury, being persons employed by and associated with the
6 Mexican Mafia LACJ Enterprise, an enterprise which was engaged in,
7 and the activities of which affected, interstate and foreign
8 commerce, knowingly and intentionally conspired to violate Title 18,
9 United States Code, Section 1962(c), that is, to conduct and
10 participate, directly and indirectly, in the conduct of the affairs
11 of that enterprise through a pattern of racketeering activity, as
12 that term is defined in Title 18, United States Code, Sections
13 1961(1) and 1961(5), consisting of:

14 multiple acts involving:

15 a. Murder, in violation of California Penal Code Sections
16 21a, 31, 182, 187, 189, and 664;

17 b. Kidnapping, in violation of California Penal Code
18 Sections 21a, 31, 182, 207, 209, and 664;

19 c. Robbery, in violation of California Penal Code
20 Sections 21a, 31, 182, 211, 212, 212.5, 213, 215, and 664;

21 d. Extortion, in violation of California Penal Code
22 Sections 21a, 31, 182, 518, 519, 524, and 664;

23 multiple offenses involving:

24 e. the distribution of, possession with intent to
25 distribute, and conspiracy to possess with intent to distribute and
26 distribute controlled substances, including methamphetamine, heroin,
27 cocaine, cocaine base, and marijuana, in violation of Title 21,
28 United States Code, Sections 841(a)(1) and 846;

1 and multiple acts indictable under the following provisions of
2 federal law:

3 f. Title 18, United States Code, Section 1512, Tampering
4 with a Witness;

5 g. Title 18, United States Code, Section 1513,
6 Retaliating against a witness;

7 h. Title 18, United States Code, Sections 1956 and 1957,
8 Money Laundering;

9 i. Title 18, United States Code, Section 1028, Identity
10 Fraud; and

11 j. Title 18, United States Code, Section 1029, Access
12 Device Fraud.

13 8. It was a further part of the conspiracy that each defendant
14 agreed that a conspirator would commit at least two acts of
15 racketeering in the conduct of the affairs of the enterprise.

16 E. MEANS BY WHICH THE OBJECT OF THE CONSPIRACY WAS TO BE
17 ACCOMPLISHED

18 9. The object of the conspiracy was to be accomplished, in
19 substance, as follows:

20 a. Defendant JOSE LANDA-RODRIGUEZ and deceased Mexican
21 Mafia member 1 ("DMM-1") and deceased Mexican Mafia member 2 ("DMM-
22 2"), as full members of the Mexican Mafia, would have the right to
23 control and collect criminal proceeds, including proceeds from
24 extortion and the sale of controlled substances, from neighborhoods
25 or correctional facilities.

26 i. DMM-1 would control the Los Angeles County Jail
27 System from around October 2007 until his death on June 20, 2013.

1 ii. Defendant JOSE LANDA-RODRIGUEZ would control the
2 Los Angeles County Jail System from on or about June 20, 2013, until
3 at least January 26, 2016, except that he would cede control of NCCF
4 to DMM-2, on or about July 6, 2014.

5 iii. DMM-2 would control NCCF from July 6, 2014,
6 through his death in June 2016.

7 b. Defendants GABRIEL ZENDEJAS-CHAVEZ, RAFAEL LEMUS, and
8 ALVINO MUNOZ, and co-conspirators Luis Garia, Daniel Cervantes,
9 Miguel Calderon, Ernesto Vargas, Miguel Rodriguez, Gilbert Parra,
10 Gerardo Tapia, and Donato Gonzales, and unindicted co-conspirator 1
11 ("UICC-1"), would act as facilitators for one or more full members of
12 the Mexican Mafia who was also a member of the Mexican Mafia LACJ
13 Enterprise and would act with the authority of that Mexican Mafia
14 LACJ Enterprise member in directing the criminal activities of the
15 Mexican Mafia LACJ Enterprise, including extortion and the sale of
16 controlled substances.

17 i. UICC-1 would carry out the orders of DMM-1 within
18 the Los Angeles County Jail System from about July 2012 through on or
19 about June 20, 2013.

20 ii. UICC-1 would carry out the orders of defendant
21 JOSE LANDA-RODRIGUEZ within the Los Angeles County Jail System from
22 on or about June 20, 2013, through on or about November 5, 2013.

23 iii. Defendant GABRIEL ZENDEJAS-CHAVEZ, from outside
24 the Los Angeles County Jail System, would use his position as an
25 attorney to assist defendant JOSE LANDA-RODRIGUEZ, and co-
26 conspirators Luis Garcia and DMM-2, and other co-conspirators, with
27 activities inside and outside the Los Angeles County Jail System.
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1 iv. Defendant RAFAEL LEMUS, from outside the Los
2 Angeles County Jail system, would work for and carry out the orders
3 for DMM-2, including collecting drug proceeds, fines, and kitty
4 extortion from NCCF from on or before February 4, 2014, through
5 November 22, 2015.

6 v. Co-conspirator Luis Garcia, from inside the Los
7 Angeles County Jail System, would work for and carry out the orders
8 of defendant JOSE LANDA-RODRIGUEZ from on or about November 5, 2013,
9 through on or about May 28, 2014.

10 vi. Defendant ALVINO MUNOZ, from both inside and
11 outside the Los Angeles County Jail System, would work for and carry
12 out the orders of defendant JOSE LANDA-RODRIGUEZ from about April
13 2015 through at least July 2015.

14 vii. Co-conspirator Daniel Cervantes, from outside the
15 Los Angeles County Jail System, would work for and carry out the
16 orders of DMM-1 from on or about October 22, 2012, through on or
17 about May 10, 2013.

18 viii. Co-conspirator Miguel Calderon, from outside
19 the Los Angeles County Jail System, would work to direct activities
20 within NCCF, MCJ, and Twin Towers on behalf of defendant JOSE LANDA-
21 RODRIGUEZ from on or about June 20, 2013, through on or about June
22 30, 2013.

23 ix. Co-conspirator Ernesto Vargas, from outside the
24 Los Angeles County Jail System, would work to direct activities
25 within NCCF on behalf of defendant JOSE LANDA-RODRIGUEZ from on or
26 about October 1, 2013, through on or about July 6, 2014.

27 x. Co-conspirator Miguel Rodriguez, from outside the
28 Los Angeles County Jail System, would work to direct activities

1 within NCCF on behalf of DMM-2, from on or about July 6, 2014, until
2 on or about October 23, 2014.

3 xi. Co-conspirator Gilbert Parra, from both inside
4 and outside the Los Angeles County Jail System, would direct the
5 activities within NCCF on behalf of defendant JOSE LANDA-RODRIGUEZ
6 from on or about October 10, 2013, to on or about December 26, 2013.

7 xii. Co-conspirator Gerardo Tapia, from outside the
8 Los Angeles County Jail System, would direct drug trafficking
9 activities outside the Los Angeles County Jail System on behalf of
10 DMM-2 from on or about April 18, 2014, through on or about May 9,
11 2014.

12 xiii. Co-conspirator Donato Gonzalez, from both
13 inside and outside the Los Angeles County Jail System, would direct
14 activities within and outside the Los Angeles County Jail System on
15 behalf of DMM-2 from on or about April 18, 2014, through on or about
16 May 9, 2014.

17 c. Defendants HECTOR DUARTE, SAMANTHA RIVERA, and MARK
18 LANDEROS, and co-conspirators Miguel Garcia and Jonathan Verdeja, and
19 unindicted co-conspirator 2 ("UICC-2"), unindicted co-conspirator 3
20 ("UICC-3") unindicted co-conspirator 4 ("UICC-4"), and unindicted co-
21 conspirator 5 ("UICC-5"), would act as facilitators for one or more
22 full members of the Mexican Mafia, and would carry out specific
23 orders related to the criminal activities of the Mexican Mafia LACJ
24 Enterprise, including extortion and the sale of controlled
25 substances, in specific locations, including LACJ.

26 i. UICC-3, from inside the Los Angeles County Jail
27 System, would direct activities at MCJ and Twin Towers on behalf of
28

1 DMM-1 from on or about December 18, 2012, through on or about June
2 20, 2013.

3 ii. Co-conspirator Miguel Garcia, from inside the Los
4 Angeles County Jail System, would direct activities at NCCF on behalf
5 of DMM-1 from on or about April 5, 2013, through on or about April
6 12, 2013.

7 iii. Unindicted co-conspirator 9 ("UICC-9"), from
8 inside the Los Angeles County Jail System, would direct activities at
9 MCJ and Twin Towers on behalf of defendant JOSE LANDA-RODRIGUEZ from
10 on or about June 23, 2013, through on or about July 3, 2013.

11 iv. Defendant HECTOR DUARTE, from inside the Los
12 Angeles County Jail System, would direct activities at NCCF on behalf
13 of DMM-2 from on or about July 6, 2014, through on or about November
14 10, 2014.

15 v. Defendant SAMANTHA RIVERA, from outside the Los
16 Angeles County Jail System, would coordinate defendant JOSE LANDA-
17 RODRIGUEZ'S dealings with other Mexican Mafia members from on or
18 about June 20, 2013, through on or about December 18, 2015.

19 vi. Defendant MARK LANDEROS, from inside the Los
20 Angeles County Jail System, would direct activities at MCJ and Twin
21 Towers on behalf of defendant JOSE LANDA-RODRIGUEZ, from on or about
22 July 24, 2013, through on or about June 5, 2014.

23 vii. Co-conspirator Jonathan Verdeja, from inside the
24 Los Angeles County Jail System, would direct activities at NCCF on
25 behalf of defendant JOSE LANDA-RODRIGUEZ from on or about October 16,
26 2013, through on or about December 26, 2013.

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1 viii. UICC-2, from inside the Los Angeles County
2 Jail System, would direct activities at MCJ and Twin Towers on behalf
3 of defendant JOSE LANDA-RODRIGUEZ.

4 ix. UICC-4, from inside the Los Angeles County Jail
5 System, would direct activities at NCCF on behalf of defendant JOSE
6 LANDA-RODRIGUEZ from on or about June 20, 2013, through on or about
7 June 30, 2013.

8 x. UICC-5, from outside LACJ, would direct
9 activities at NCCF on behalf of DMM-2, from on or about August 22,
10 2015, through June 4, 2016.

11 d. Defendants CECILIA VIRGEN and NANCY DUARTE, UICC-6,
12 and co-conspirators Laureen Garcia, Valerie Trejo, Genessis Blanco,
13 and Kelly Jo Bell, would act as secretaries for high-level Mexican
14 Mafia LACJ Enterprise associates, passing messages regarding,
15 facilitating communication about, and keeping records of the criminal
16 activities of the Mexican Mafia LACJ Enterprise, including extortion
17 and the sale of controlled substances.

18 i. Defendant CECILIA VIRGEN would act as the
19 secretary for co-conspirator Daniel Cervantes for activities inside
20 the Los Angeles County Jail System from on or about December 18,
21 2012, through on or about May 22, 2013.

22 ii. Co-conspirator Laureen Garcia would act as the
23 secretary for co-conspirator Ernesto Vargas for activities inside
24 NCCF from on or about October 1, 2013, through on or about November
25 1, 2013.

26 iii. Defendant NANCY DUARTE would act as the secretary
27 for defendant HECTOR DUARTE for activities at NCCF from on or about
28 July 6, 2014, through on or about October 23, 2014.

1 iv. Co-conspirator Valerie Trejo would act as the
2 secretary for UICC-3 for activities at MCJ and Twin Towers from on or
3 about February 2013, through on or about June 20, 2013.

4 v. Co-conspirator Kelly Jo Bell would act as a
5 secretary for defendant ALVINO MUNOZ from August 19, 2015, through
6 October 14, 2015.

7 vi. Co-conspirator Genessis Blanco would act as a
8 secretary for DMM-2 and UICC-6 for activities inside NCCF from on or
9 about August 22, 2015, through on or about October 23, 2015.

10 vii. UICC-6 would act as a secretary for defendant
11 MARK LANDEROS in January 2016.

12 e. Unindicted co-conspirator 7 ("UICC-7") would carry out
13 the orders of DMM-1, UICC-1, and UICC-3 to control Twin Towers from
14 on or about July 17, 2012, through on or about June 20, 2013.

15 f. Defendants VALENTIN CORDOVA and DAVID BERNARDINO, and
16 co-conspirators Miguel Garcia, Jose Flores, Mark Levy, Frankie
17 Megorado, Manuel Jimenez, Alavaro Leyva, Chris Ferreira, and Andrew
18 Pineda, and unindicted co-conspirators Robert Ramirez, UICC-4,
19 unindicted co-conspirator 8 ("UICC-8"), unindicted co-conspirator 10
20 ("UICC-10"), unindicted co-conspirator 11 ("UICC-11"), and unindicted
21 co-conspirator 12 ("UICC-12"), would carry out the orders of the
22 Mexican Mafia LACJ Enterprise within specific portions of the Los
23 Angeles County Jail System, thereby facilitating the criminal
24 activities of the Mexican Mafia LACJ Enterprise, including extortion
25 and the sale of controlled substances.

26 i. Co-conspirator Jose Flores would carry out the
27 orders of defendant CECILIA VIRGEN in NCCF from on or about December
28 19, 2012, through on or about January 22, 2013.

1 ii. UICC-8 would carry out the orders of defendant
2 CECILIA VIRGEN inside NCCF from on or about October 26, 2012, through
3 on or about December 28, 2012.

4 iii. Co-conspirator Mark Levy would carry out the
5 orders of defendant CECILIA VIRGEN inside NCCF from on or about
6 February 10, 2013, through on or about February 13, 2013.

7 iv. Defendant VALENTIN CORDOVA would carry out the
8 orders of defendant CECILIA VIRGEN inside NCCF from on or about April
9 2, 2013, through on or about May 20, 2013.

10 v. UICC-11 would carry out the orders of defendant
11 CECILIA VIRGEN inside NCCF from on or about March 25, 2013, through
12 on or about May 23, 2013.

13 vi. Co-conspirator Frankie Megorado would carry out
14 the orders of defendant CECILIA VIRGEN inside NCCF from on or about
15 April 6, 2013, through on or about May 22, 2013, and would carry out
16 the orders of co-conspirator Laureen Garcia inside NCCF from on or
17 about May 23, 2013, through October 5, 2013.

18 vii. Co-conspirator Jose Olea would carry out the
19 orders of defendant CECILIA VIRGEN inside NCCF from on or about April
20 7, 2013, through on or about April 13, 2013.

21 viii. UICC-10 would carry out the orders of UICC-3
22 inside MCJ and Twin Towers from on or about December 30, 2012,
23 through on or about May 30, 2013.

24 ix. UICC-4 would carry out the orders of co-
25 conspirator Miguel Calderon inside NCCF from on or about June 20,
26 2013, through on or about June 30, 2013.

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1 x. Co-conspirator Manuel Jimenez would carry out the
2 orders of co-conspirator Laureen Garcia inside NCCF from on or about
3 October 1, 2013, through on or about November 1, 2013.

4 xi. Co-conspirator Alavaro Leyva would carry out the
5 orders of co-conspirator Laureen Garcia inside NCCF from on or about
6 October 2, 2013, through on or about October 5, 2013.

7 xii. Co-conspirator Chris Ferreira would carry out the
8 orders of defendant NANCY DUARTE inside NCCF from on or about July 6,
9 2014, through on or about July 25, 2014.

10 xiii. Co-conspirator Miguel Garcia would carry out
11 the orders of co-conspirator Ernesto Vargas inside NCCF from on or
12 about September 24, 2013, through on or about October 21, 2013, and
13 would carry out the orders of unindicted co-conspirator 52 ("UICC-
14 52") inside NCCF from in and around November 2016.

15 xiv. Defendant DAVID BERNARDINO would carry out the
16 orders of defendant NANCY DUARTE inside NCCF from at least no later
17 than September 1, 2014 through at least no earlier than September 6,
18 2014.

19 xv. Co-conspirator Andrew Pineda would carry out the
20 orders of co-conspirator Genessis Blanco inside NCCF from on or about
21 August 22, 2015, through on or about October 23, 2015.

22 xvi. Unindicted co-conspirator Robert Ramirez would
23 carry out the orders of co-conspirator Kelly Jo Bell at MCJ from on
24 or about August 19, 2015, through on or about October 14, 2015.

25 xvii. UICC-12 would carry out the orders of
26 defendant MARK LANDEROS in MCJ in January 2016.

27 g. Defendants MIRIAM MEZA, ANA MARTINEZ, and ADRIAN
28 ARAIZA, and co-conspirators Alondra Gomez, Alvaro Ruiz, Gail Ponce,

1 and Diana Martinez, and unindicted co-conspirators Kristen Ayala,
2 unindicted co-conspirator 14 ("UICC-14"), unindicted co-conspirator
3 15 ("UICC-15"), and unindicted co-conspirator 16 ("UICC-16"), would
4 assist Mexican Mafia LACJ Enterprise members and associates in
5 directing activities inside and outside the Los Angeles County Jail
6 System, thereby facilitating the criminal activities of the Mexican
7 Mafia LACJ Enterprise, including extortion and the sale of controlled
8 substances.

9 i. Co-conspirator Alondra Gomez would assist co-
10 conspirator Daniel Cervantes in collecting and laundering the
11 proceeds of Mexican Mafia LACJ Enterprise activities.

12 ii. UICC-14 would pass DMM-1's directions regarding
13 the collection and laundering of the proceeds of Mexican Mafia LACJ
14 Enterprise activities to co-conspirator Daniel Cervantes.

15 iii. Defendant MIRIAM MEZA would assist UICC-3 and
16 defendant CECILIA VIRGEN in collecting proceeds of Mexican Mafia LACJ
17 Enterprise activities.

18 iv. Defendant ANA MARTINEZ would assist UICC-10 by
19 obtaining "burnout" phones, arranging the smuggling of drugs into the
20 Los Angeles County Jail System, and collecting money for UICC-3.

21 v. Unindicted co-conspirator Kristen Ayala would
22 assist defendant MARK LANDEROS in smuggling drugs into the Los
23 Angeles County Jail System.

24 vi. Co-conspirator Alvaro Ruiz would assist co-
25 conspirator Donato Gonzales by organizing shipments of drugs into the
26 Los Angeles County Jail System, and would assist defendant JOSE
27 LANDA-RODRIGUEZ by passing messages.

1 vii. Defendant ADRIAN ARAIZA would assist co-
2 conspirator Daniel Cervantes by providing drugs to be smuggled into
3 the Los Angeles County Jail System.

4 viii. UICC-15 would assist UICC-3 by moving the
5 kitty money from co-conspirator Angel Sanchez's inmate trust account
6 to co-conspirator Valerie Trejo.

7 ix. co-conspirator Gail Ponce would pass defendant
8 HECTOR DUARTE's orders to defendant DAVID BERNARDINO.

9 x. UICC-16 would pass messages to and from UICC-12.

10 xi. Co-conspirator Diana Martinez would assist co-
11 conspirator Gerardo Tapia in trafficking controlled substances, and
12 in carrying out orders to commit acts of violence on behalf of
13 Mexican Mafia LACJ Enterprise members.

14 h. Defendants MARK LANDEROS, DAVID DIAZ, and ANA
15 MARTINEZ, and co-conspirators Luis Garica, Valerie Trejo, Kelly Jo
16 Bell, Marlon Cornejo, Angel Sanchez, Juan Reyes, Richard Bailey,
17 Michael Bennett, Edwin Ayala, and David Villalobos, and others known
18 and unknown to the Grand Jury, would carry out the orders and
19 business of the Mexican Mafia LACJ Enterprise in furtherance of its
20 criminal activities, including extortion and the sale of controlled
21 substances.

22 i. Defendant MARK LANDEROS and others known and
23 unknown to the Grand Jury would engage in acts of violence inside the
24 Los Angeles County Jail System to enforce Mexican Mafia rules and
25 discipline, to collect debts on behalf of the Mexican Mafia LACJ
26 Enterprise, including proceeds from the sale of controlled
27 substances, and to extort on behalf of the Mexican Mafia LACJ
28 Enterprise.

1 ii. Defendant DAVID DIAZ and others known and unknown
2 to the Grand Jury would engage in acts of violence outside of the Los
3 Angeles County Jail System on behalf of defendant JOSE LANDA-
4 RODRIGUEZ.

5 iii. Defendant ANA MARTINEZ, and co-conspirators
6 Valerie Trejo, Kelly Jo Bell, and Richard Bailey, and others known
7 and unknown to the grand jury would assist in the smuggling of drugs
8 into the Los Angeles County Jail System.

9 iv. Unindicted co-conspirators known and unknown to
10 the Grand Jury would smuggle drugs into the Los Angeles County Jail
11 System.

12 v. Co-conspirators Marlon Cornejo, Juan Reyes,
13 Michael Bennett, and Edwin Ayala, and others known and unknown to the
14 grand jury would smuggle drugs within the Los Angeles County Jail
15 System.

16 vi. Co-conspirators Marlon Cornejo, Juan Reyes,
17 Michael Bennett, and Edwin Ayala, and others known and unknown to the
18 grand jury would smuggle written communications within the Los
19 Angeles County Jail System.

20 vii. Co-conspirator Angel Sanchez would allow his
21 inmate trust account to be used to move and launder Mexican Mafia
22 LACJ Enterprise proceeds.

23 F. OVERT ACTS

24 10. In furtherance of the conspiracy and to accomplish its
25 object, on or about the following dates, defendants JOSE LANDA-
26 RODRIGUEZ, GABRIEL ZENDEJAS-CHAVEZ, RAFAEL LEMUS, ALVINO MUNOZ,
27 HECTOR DUARTE, SAMANTHA RIVERA, MARK LANDEROS, CECILIA VIRGEN, NANCY
28 DUARTE, VALENTIN CORDOVA, DAVID BERNARDINO, MIRIAM MEZA, ANA

1 MARTINEZ, ADRIAN ARAIZA, and DAVID DIAZ, and others known and unknown
2 to the Grand Jury, committed various overt acts within the Central
3 District of California, and elsewhere, including, but not limited to,
4 the following:

5 Smuggling and Possession of Cocaine and Methamphetamine within LACJ
6 and Collection of the Thirds Tax

7 Overt Act No. 1: On or before September 10, 2012, J.M.
8 possessed and distributed cocaine and methamphetamine within MCJ.

9 Overt Act No. 2: On or before September 10, 2012, J.M. paid
10 his thirds tax on the cocaine and methamphetamine to UICC-1.

11 Overt Act No. 3: On September 10, 2012, co-conspirator Marlon
12 Cornejo possessed J.M.'s thirds tax, consisting of approximately 2.25
13 grams of cocaine and .09 grams of methamphetamine, in order to give
14 it to UICC-1.

15 Overt Act No. 4: On September 10, 2012, J.M. possessed
16 approximately .15 grams of cocaine within LACJ with intent to
17 distribute.

18 Laundering of Money from LACJ

19 Overt Act No. 5: From August 22, 2012, through at least May
20 9, 2013, co-conspirator Alondra Gomez opened and maintained a post
21 office box for the purpose of collecting payments from Mexican Mafia
22 LACJ Enterprise activities.

23 Overt Act No. 6: On October 22, 2012, co-conspirator Daniel
24 Cervantes met with a person he believed to be a criminal associate,
25 but who was actually an undercover agent from Homeland Security
26 Investigations (the "HSI UC"), to launder the proceeds of Mexican
27 Mafia LACJ Enterprise activities.

1 Overt Act No. 7: On October 22, 2012, co-conspirator Daniel
2 Cervantes gave \$9,239 in money orders representing proceeds of
3 Mexican Mafia LACJ Enterprise activities to the HSI UC for the HSI UC
4 to launder by negotiating the money orders in exchange

5 Overt Act No. 8: On October 22, 2012, co-conspirator Daniel
6 Cervantes received from the HSI UC approximately \$8,315 in cash
7 representing the proceeds from the negotiation of the money orders.

8 Laundering of Money from LACJ

9 Overt Act No. 9: On November 5, 2012, co-conspirator Daniel
10 Cervantes met with the HSI UC and gave approximately \$11,032 in money
11 orders representing proceeds of Mexican Mafia LACJ Enterprise
12 activities to the HSI UC for the HSI UC to launder by negotiating the
13 money orders in exchange for a fee.

14 Overt Act No. 10: On November 6, 2012, co-conspirator Daniel
15 Cervantes received from the HSI UC approximately \$9,928 in cash
16 representing the proceeds from the negotiation of the money orders.

17 Assault of R.G. for Interfering with Drug Trafficking

18 Overt Act No. 11: Prior to December 6, 2012, defendant CECILIA
19 VIRGEN ordered co-conspirator Jose Flores to have R.G. assaulted for
20 violating Mexican Mafia rules by opening drugs that belonged to the
21 Mexican Mafia LACJ Enterprise without authorization.

22 Overt Act No. 12: On or before December 6, 2012, co-
23 conspirator Jose Flores ordered that R.G. be assaulted for violating
24 Mexican Mafia rules by opening drugs that belonged to the Mexican
25 Mafia LACJ Enterprise without authorization.

26 Overt Act No. 13: On December 6, 2012, unindicted co-
27 conspirators assaulted R.G. on co-conspirator Jose Flores's orders.

1 Overt Act No. 14: On December 20, 2012, in a recorded
2 telephone call, defendant CECILIA VIRGEN advised co-conspirator Jose
3 Flores that R.G. had been assaulted.

4 Overt Act No. 15: On December 20, 2012, in a recorded
5 telephone call, defendant CECILIA VIRGEN ordered that R.G. be
6 assaulted again, and co-conspirator Jose Flores suggested that the
7 assault be for 39 seconds.

8 Laundering of Money from LACJ

9 Overt Act No. 16: On November 9, 2012, UICC-14 called co-
10 conspirator Daniel Cervantes from LACJ, and in coded language during
11 this recorded telephone call, co-conspirator Daniel Cervantes told
12 UICC-14 that he had \$13,000 in proceeds of Mexican Mafia LACJ
13 Enterprise activities and asked what he should do with it.

14 Overt Act No. 17: On November 9, 2012, UICC-14 asked DMM-1
15 what co-conspirator Daniel Cervantes should do with the \$13,000.

16 Overt Act No. 18: On November 9, 2012, in a recorded telephone
17 conversation, UICC-14 passed on to co-conspirator Daniel Cervantes
18 DMM-1's directions that co-conspirator Daniel Cervantes should
19 launder all \$13,000 and that \$12,000 of Mexican Mafia LACJ Enterprise
20 proceeds be given to DMM-1's wife.

21 Overt Act No. 19: On December 6, 2012, co-conspirator Daniel
22 Cervantes met with the HSI UC and gave approximately \$13,000 in money
23 orders representing proceeds of Mexican Mafia LACJ Enterprise
24 activities in LACJ to the HSI UC for the HSI UC to launder by
25 negotiating the money orders in exchange for a fee.

26 Overt Act No. 20: On December 7, 2012, co-conspirator Daniel
27 Cervantes received from the HSI UC approximately \$10,237 in cash
28

1 representing the proceeds from the negotiation of the money orders
2 and approximately \$2,100 in uncashed money orders.

3 Overt Act No. 21: On December 13, 2012, co-conspirator Daniel
4 Cervantes arranged for the HSI UC to meet with co-conspirator Alondra
5 Gomez for the purpose of laundering approximately \$2,100 in money
6 orders representing proceeds from Mexican Mafia LACJ Enterprise
7 activities.

8 Overt Act No. 22: On December 13, 2012, co-conspirator Alondra
9 Gomez met with the HSI UC and negotiated approximately \$2,100 in
10 money orders representing proceeds of Mexican Mafia LACJ Enterprise
11 activities in LACJ.

12 Extortion and Assault of J.D.

13 Overt Act No. 23: On December 18, 2012, in a recorded
14 telephone call, defendant CECILIA VIRGEN asked UICC-3 to collect a
15 debt owed to her by J.D. or to assault J.D. if he did not pay.

16 Overt Act No. 24: From December 18, 2012, through February 11,
17 2013, UICC-3 arranged for J.D. to be repeatedly assaulted in LACJ for
18 failing to pay a debt.

19 Overt Act No. 25: Prior to January 18, 2013, unindicted co-
20 conspirator 18 ("UICC-18") allowed his LACJ inmate trust account to
21 be used to collect the debt from J.D.

22 Overt Act No. 26: On January 25, 2013, UICC-3 told defendant
23 CECILIA VIRGEN that \$200 from J.D. had been placed on UICC-18's LACJ
24 inmate trust account.

25 Overt Act No. 27: On January 29, 2013, in a recorded telephone
26 call, defendant CECILIA VIRGEN asked UICC-3 if J.D. had paid his
27 debt.

1 Overt Act No. 28: On February 7, 2013, in a recorded telephone
2 call, UICC-3 instructed co-conspirator Valerie Trejo to pass a
3 message to defendant CECILIA VIRGEN that J.D. had not paid his debt,
4 and co-conspirator Valerie Trejo confirmed that she sent the message.

5 Overt Act No. 29: On February 11, 2013, in a recorded
6 telephone call, UICC-3 again instructed co-conspirator Valerie Trejo
7 to tell defendant CECILIA VIRGEN that J.D. had not paid the debt.

8 Overt Act No. 30: On February 11, 2013, in a recorded
9 telephone call, UICC-3 told defendant CECILIA VIRGEN that J.D. had
10 not paid the debt but had been assaulted, and UICC-3 and defendant
11 CECILIA VIRGEN discussed where they could find J.D. outside of LACJ.

12 Extortion of L.O.

13 Overt Act No. 31: From December 17, 2012, through December 30,
14 2012, UICC-3 extorted approximately \$2,000 worth of heroin from L.O.

15 Overt Act No. 32: From December 19, 2012, through December 30,
16 2012, in recorded telephone calls from UICC-3, defendant CECILIA
17 VIRGEN discussed her plans to obtain drugs provided by L.O. as a
18 result of extortion and to have the drugs smuggled into LACJ.

19 Smuggling of Heroin and Methamphetamine within LACJ

20 Overt Act No. 33: On December 19, 2012, UICC-3 arranged to
21 transport approximately 5.33 grams of black tar heroin and 1.65 grams
22 of a mixture or substance containing a detectable amount of
23 methamphetamine from MCJ to NCCF to be sold on behalf of the Mexican
24 Mafia LACJ Enterprise.

25 Overt Act No. 34: On December 19, 2012, co-conspirator Juan
26 Reyes transported approximately 5.33 grams of black tar heroin and
27 1.65 grams of a mixture or substance containing a detectable amount
28

1 of methamphetamine from MCJ to NCCF in his body on behalf of the
2 Mexican Mafia LACJ Enterprise.

3 Overt Act No. 35: On December 23, 2012, in a recorded
4 telephone call, defendant CECILIA VIRGEN informed UICC-3 that the
5 black tar heroin and methamphetamine carried by co-conspirator Juan
6 Reyes had been seized by law enforcement.

7 Assault and Extortion of S.M.

8 Overt Act No. 36: Prior to December 21, 2012, defendant
9 CECILIA VIRGEN ordered that S.M. be assaulted because he was in bad
10 standing with the Mexican Mafia LACJ Enterprise.

11 Overt Act No. 37: On December 21, 2012, unindicted co-
12 conspirators assaulted S.M.

13 Smuggling of Heroin into LACJ

14 Overt Act No. 38: From October 26, 2012, through October 31,
15 2012, in recorded telephone calls, UICC-8 and unindicted co-
16 conspirator 19 ("UICC-19") arranged for an attorney, unindicted co-
17 conspirator 20 ("UICC-20") to bring heroin into LACJ by hiding the
18 heroin in a greeting card that UICC-19 would give to UICC-20 to pass
19 to UICC-8.

20 Overt Act No. 39: Prior to and on December 22, 2012, in
21 recorded telephone calls, defendant CECILIA VIRGEN discussed with
22 UICC-8 the plan to smuggle heroin into LACJ, and defendant CECILIA
23 VIRGEN directed UICC-8 to allow her to add approximately one-half
24 ounce of heroin into the heroin-filled greeting card.

25 Overt Act No. 40: On December 24, 2012, in a recorded
26 telephone conversation, UICC-8 and UICC-19 ordered approximately one
27 and one-half ounces of heroin from unindicted co-conspirator 21
28

1 ("UICC-21") and discussed that the destination for the heroin was
2 LACJ.

3 Overt Act No. 41: On December 25, 2012, UICC-19 purchased
4 approximately one and one-half ounces of heroin from UICC-21.

5 Overt Act No. 42: On December 28, 2012, as arranged by
6 defendant CECILIA VIRGIN, UICC-8, UICC-19, UICC-20 attempted to
7 smuggle a greeting card containing approximately 23.8 grams of heroin
8 into LACJ, but were caught by LASD deputies.

9 Collection of the Kitty

10 Overt Act No. 43: From July 14, 2012, through May 22, 2013,
11 defendant MIRIAM MEZA collected kitty proceeds, drug proceeds, and
12 other extortion proceeds from LACJ and placed that money onto the
13 inmate trust accounts of unindicted co-conspirators UICC-3 and
14 UICC-18.

15 Orders to Assault R.G. and "Stomper" from the Rockwood gang because
16 of R.G.'s Interference with Drug Trafficking

17 Overt Act No. 44: From December 29, 2012, through December 31,
18 2012, in recorded telephone calls from co-conspirator Jose Flores,
19 defendant CECILIA VIRGEN ordered that R.G. be assaulted for
20 protesting his previous assault and that a Sureno known as "Stomper"
21 from the Rockwood gang be assaulted for speaking up on behalf of R.G.

22 Money Laundering Using an Inmate Trust Account

23 Overt Act No. 45: On or before December 27, 2012, UICC-7
24 directed his subordinates to put the kitty and drug money onto the
25 inmate trust account of co-conspirator Angel Sanchez.

26 Overt Act No. 46: From December 23, 2012, through January 31,
27 2013, -conspirator Angel Sanchez allowed his LACJ inmate trust
28

1 account to be used by the Mexican Mafia LACJ Enterprise to launder
2 the kitty and drug money.

3 Overt Act No. 47: On or before January 25, 2013, defendant
4 MARK LANDEROS sent a kite to inform UICC-3 that the kitty money was
5 being placed on the LACJ inmate trust account of -conspirator Angel
6 Sanchez.

7 Overt Act No. 48: From December 23, 2012, through January 19,
8 2013, in recorded telephone conversations, -conspirator Angel Sanchez
9 and UICC-15 discussed withdrawing the Mexican Mafia LACJ Enterprise's
10 money from -conspirator Angel Sanchez's LACJ inmate trust account.

11 Overt Act No. 49: From on or before January 11, 2013, through
12 January 31, 2013, UICC-15, withdrew the kitty and drug money from -
13 conspirator Angel Sanchez's LACJ inmate trust account to be given to
14 co-conspirator Valerie Trejo for UICC-3.

15 Laundering of Money from LACJ

16 Overt Act No. 50: On January 9, 2013, co-conspirator Daniel
17 Cervantes met with and gave approximately \$10,046 in money orders
18 representing proceeds of Mexican Mafia LACJ Enterprise activities to
19 the HSI UC for the HSI UC to launder by negotiating the money orders
20 in exchange for a fee.

21 Overt Act No. 51: On January 10, 2013, co-conspirator Daniel
22 Cervantes received from the the HSI UC approximately \$9,414 in cash
23 representing the proceeds from the negotiation of the money orders.

24 Attempted Smuggling of Marijuana and Correspondence Related to
25 Extortion and Money Laundering into LACJ

26 Overt Act No. 52: On January 18, 2013, unindicted co-
27 conspirator 22 ("UICC-22") transported, in his body, marijuana, a
28

1 kite discussing extortion and money laundering, and three roll calls
2 from UICC-7 intended for UICC-1.

3 Smuggling of Heroin and Methamphetamine into LACJ

4 Overt Act No. 53: From December 19, 2012, through January 22,
5 2013, defendant CECILIA VIRGEN, co-conspirator Jose Flores, UICC-3
6 and unindicted co-conspirator 23 ("UICC-23"), arranged to smuggle
7 approximately 64.6 grams of heroin and approximately 36.7 grams of
8 methamphetamine into LACJ on behalf of DMM-1.

9 Overt Act No. 54: On January 19, 2013, at defendant CECILIA
10 VIRGEN's direction, UICC-23 possessed and smuggled in his body at
11 least 64.6 grams of heroin and 36.7 grams of methamphetamine into
12 LACJ for DMM-1.

13 Overt Act No. 55: On January 22, 2013, UICC-23 gave an unknown
14 amount of a controlled substance to UICC-3 in LACJ.

15 Possession of Methamphetamine, Cash, and Firearms

16 Overt Act No. 56: On January 29, 2013, defendant ADRIAN ARAIZA
17 possessed with intent to distribute approximately 6,317.7 grams of
18 methamphetamine, on behalf of DMM-1.

19 Overt Act No. 57: On January 29, 2013, defendant ADRIAN ARAIZA
20 possessed two firearms in order to protect the approximately 6,317.7
21 grams of methamphetamine.

22 Overt Act No. 58: On January 29, 2013, defendant defendant
23 ADRIAN ARAIZA possessed approximately \$444,372 in drug proceeds on
24 behalf of DMM-1.

25 Attempted Murder of M.A.

26 Overt Act No. 59: On February 7, 2013, co-conspirator Luis
27 Garcia attempted to kill M.A. in LACJ because M.A. was on the "Green
28 Light" list.

1 Assault and Extortion of S.M.

2 Overt Act No. 60: From February 10, 2013, through February 13,
3 2013, in recorded telephone calls, defendant CECILIA VIRGEN and co-
4 conspirator Mark Levy arranged for S.M. to be assaulted until he made
5 a payment to the Mexican Mafia LACJ Enterprise.

6 Overt Act No. 61: On February 13, 2013, unindicted
7 coconspirators assaulted S.M. because of his bad standing with the
8 Mexican Mafia LACJ Enterprise.

9 Smuggling of Methamphetamine, Heroin, and Marijuana into LACJ

10 Overt Act No. 62: From January 22, 2013, through February 28,
11 2013, defendant CECILIA VIRGEN, co-conspirators Valerie Trejo,
12 Richard Bailey, Richard Griego, and UICC-3 arranged for heroin,
13 methamphetamine and marijuana to be smuggled to UICC-3 in LACJ on
14 behalf of DMM-1.

15 Overt Act No. 63: On February 12, 2013, co-conspirator Richard
16 Bailey packaged methamphetamine, heroin, and marijuana for unindicted
17 co-conspirator Richard Griego to smuggle into LACJ.

18 Overt Act No. 64: On February 28, 2013, unindicted co-
19 conspirator Richard Griego possessed in his body and attempted to
20 smuggle approximately 26.2 grams of pure methamphetamine,
21 approximately 62.9 grams of heroin, and approximately 11.75 grams of
22 marijuana into LACJ for UICC-3 and DMM-1.

23 Assault of I.E. for Taking Mexican Mafia LACJ Enterprise Extortion
24 Proceeds and for Cooperating with Law Enforcement

25 Overt Act No. 65: On March 15, 2013, unindicted co-
26 conspirators assaulted I.E. at the direction of defendant VALENTIN
27 CORDOVA.
28

1 Overt Act No. 66: On April 12, 2013, in a recorded telephone
2 call, defendant VALENTIN CORDOVA reported to defendant CECILIA VIRGEN
3 that he had ordered that I.E. be assaulted because I.E. had been
4 taking Mexican Mafia LACJ Enterprise proceeds and had told LACJ
5 deputies about a previous assault on him, so that defendant CECILIA
6 VIRGEN could inform other facilities that I.E. should be assaulted.
7 Assault and Extortion of S.M.

8 Overt Act No. 67: Prior to March 21, 2013, defendant CECILIA
9 VIRGEN ordered that S.M. be assaulted until he made a payment to the
10 Mexican Mafia LACJ Enterprise.

11 Overt Act No. 68: On March 21, 2013, unindicted co-
12 conspirators assaulted S.M. because of his bad standing with the
13 Mexican Mafia LACJ Enterprise.

14 Assault of R.K. and Planned Assault of G.S. for Cooperating with Law
15 Enforcement

16 Overt Act No. 69: On or before March 25, 2013, UICC-11 ordered
17 that R.K. be assaulted because UICC-11 suspected that R.K. had
18 cooperated with law enforcement.

19 Overt Act No. 70: On March 25, 2013, unindicted co-
20 conspirators assaulted R.K. on UICC-11's orders because of R.K.'s
21 suspected cooperation with law enforcement.

22 Overt Act No. 71: From April 6, 2013, through May 21, 2013,
23 UICC-3 and defendant CECILIA VIRGEN discussed, in recorded telephone
24 calls, locating G.S. in order to have him assaulted as discipline for
25 his suspected cooperation with law enforcement.

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1 Assault of A.R. in Order to Commit Extortion

2 Overt Act No. 72: On March 31, 2013, defendant MARK LANDEROS
3 and unindicted co-conspirator 25 ("UICC-25") assaulted A.R. because
4 they believed A.R. was in LACJ for a sexual assault.

5 Assault and Extortion of J.M.-2

6 Overt Act No. 73: On or before April 2, 2013, defendant
7 VALENTIN CORDOVA ordered the assault of J.M.-2 because J.M.-2 lied
8 about his identity to the Mexican Mafia LACJ Enterprise.

9 Overt Act No. 74: On April 2, 2013, unindicted co-conspirators
10 assaulted J.M.-2 because of his bad standing with the Mexican Mafia
11 LACJ Enterprise.

12 Overt Act No. 75: On April 6, 2013, in a recorded telephone
13 call, defendant CECILIA VIRGEN ordered that J.M.-2 be assaulted until
14 he pays his debt to the Mexican Mafia LACJ Enterprise.

15 Extortion of J.M.-3

16 Overt Act No. 76: From April 6, 2013, through May 20, 2013, in
17 recorded telephone conversations, defendant CECILIA VIRGEN spoke to
18 defendant VALENTIN CORDOVA and co-conspirators Frankie Megorado and
19 UICC-3 about finding J.M.-3 in LACJ to collect a debt that J.M.-3
20 owed to the Mexican Mafia LACJ Enterprise.

21 Overt Act No. 77: On April 6, 2013, in a recorded telephone
22 conversation, defendant VALENTIN CORDOVA told defendant CECILIA
23 VIRGEN he would look for J.M.-3.

24 Overt Act No. 78: On May 16, 2013, in a recorded telephone
25 conversation, UICC-3 told defendant CECILIA VIRGEN that J.M.-3 had
26 paid his debt to the Mexican Mafia.

27 Overt Act No. 79: On May 19, 2013, in a recorded telephone
28 conversation, defendant CECILIA VIRGEN told co-conspirator Frankie

1 Megorado that J.M.-3 still owed money to the Mexican Mafia, but that
2 she was going to allow J.M.-3 to pay \$400 instead of \$600, and co-
3 conspirator Frankie Megorado provided J.M.-3's name and booking
4 number to defendant CECILIA VIRGEN so that he could be located.

5 Assault of Co-conspirator Miguel Garcia for not Remitting the Proper
6 Drug and Extortion Proceeds

7 Overt Act No. 80: From April 5, 2013, through April 12, 2013,
8 in recorded telephone conversations, defendant CECILIA VIRGEN ordered
9 co-conspirator Jose Olea to assault co-conspirator Miguel Garcia and
10 to replace co-conspirator Miguel Garcia as the shot-caller of the 700
11 floor of NCCF because co-conspirator Miguel Garcia had not been
12 properly remitting extortion and drug proceeds and because co-
13 conspirator Miguel Garcia's wife had disrespected defendant CECILIA
14 VIRGEN during the dispute over the proceeds.

15 Overt Act No. 81: On April 9, 2013, unidentified co-
16 conspirators assaulted co-conspirator Miguel Garcia as directed by
17 co-conspirator Jose Olea.

18 Overt Act No. 82: On April 10, 2013, in a recorded telephone
19 conversation, defendant CECILIA VIRGEN directed co-conspirator Jose
20 Olea to continue assaulting co-conspirator Miguel Garcia until co-
21 conspirator Miguel Garcia surrendered the roll calls, the address to
22 which to send kitty and other money, phone numbers, and calling cards
23 to co-conspirator Jose Olea.

24 Overt Act No. 83: On April 12, 2013, after co-conspirator Jose
25 Olea told defendant CECILIA VIRGEN in a recorded telephone call that
26 co-conspirator Miguel Garcia had complied, defendant CECILIA VIRGEN
27 ordered that co-conspirator Miguel Garcia be assaulted until he left
28 the 700 floor of NCCF.

1 Overt Act No. 84: On April 12, 2013, co-conspirator Jose Olea
2 arranged for co-conspirator Miguel Garcia to be assaulted again.

3 Overt Act No. 85: On April 12, 2013, unidentified co-
4 conspirators assaulted co-conspirator Miguel Garcia as directed by
5 co-conspirator Jose Olea.

6 Assault of L.M. for Attempting to Evade Extortion

7 Overt Act No. 86: On April 23, 2013, co-conspirators Mark
8 Martinez, Amo West, Ramiro Andrade, Oswaldo Quintero, Nicholas
9 Escarcega, Christian Fuentes, Francisco Ruiz, and Jose Vera assaulted
10 L.M. in order to maintain Mexican Mafia LACJ Enterprise discipline
11 and punish L.M. for attempting to evade extortion.

12 Overt Act No. 87: On April 23, 2013, unknown co-conspirators
13 moved the unconscious body of L.M. in order to prevent the detection
14 of the beating of L.M.

15 Overt Act No. 88: On April 23, 2013, unindicted co-conspirator
16 Ramiro Andrade and other unknown co-conspirators cleaned blood and
17 other evidence of an assault from the location of the beating of L.M.
18 to prevent the detection of the beating of L.M..

19 Assaults of J.V. and M.M.F.

20 Overt Act No. 89: On April 28, 2013, an unindicted co-
21 conspirator assaulted J.V. for volunteering for and backing out of an
22 agreed upon assault.

23 Overt Act No. 90: On April 28, 2013, unindicted co-
24 conspirators assaulted M.M.F. for violating a Mexican Mafia LACJ
25 Enterprise rule against associating with African-American inmates.

26 Laundering of Money from LACJ

27 Overt Act No. 91: On May 9, 2013, co-conspirator Daniel
28 Cervantes met with and gave the HSI UC approximately \$7,976 in money

1 orders representing proceeds of Mexican Mafia LACJ Enterprise
2 activities for the HSI UC to launder by negotiating the money orders
3 in exchange for a fee.

4 Overt Act No. 92: On May 10, 2013, co-conspirator Daniel
5 Cervantes received from the ICE UC \$7,178 in cash representing
6 proceeds from the negotiation of the money orders.

7 Possession of Methamphetamine and Mexican Mafia LACJ Enterprise
8 Correspondence Regarding Extortion in LACJ

9 Overt Act No. 93: On May 13, 2013, in LACJ, co-conspirator
10 Michael Bennett possessed inside his body approximately 5.5 grams of
11 methamphetamine, which he intended to give to UICC-1.

12 Overt Act No. 94: On May 13, 2013, co-conspirator Michael
13 Bennett carried a message regarding extortion and leadership within
14 LACJ in his body from UICC-3 intended for UICC-1.

15 Overt Act No. 95: On May 13, 2013, UICC-3 reported to UICC-1
16 that MCJ had paid \$1,500 in kitty money, that he had fined a Sureno
17 \$600 and ordered that the Sureno be assaulted for losing drugs, and
18 identified various other shot-callers within LACJ.

19 Possession of Cocaine and Methamphetamine and Correspondence Related
20 to Drug Trafficking and Extortion

21 Overt Act No. 96: On May 15, 2013, in LACJ, co-conspirator
22 Edwin Ayala possessed with the intent to distribute to others on
23 behalf of the Mexican Mafia LACJ Enterprise approximately .6 grams of
24 cocaine base in the form of crack cocaine and approximately .54 grams
25 of methamphetamine.

26 Overt Act No. 97: On May 15, 2013, co-conspirator Edwin Ayala
27 possessed two kites from UICC-11 intended for UICC-3 and unindicted
28 co-conspirator 27 ("UICC-27").

1 Conspiracy to Extort and Assault J.J.

2 Overt Act No. 98: On May 17, 2013, in a recorded telephone
3 call, defendants CECILIA VIRGEN and VALENTIN CORDOVA, and co-
4 conspirator Frankie Megorado, discussed having J.J. assaulted for
5 interfering with the orderly administration of Mexican Mafia LACJ
6 Enterprise operations, including the handling of drug and extortion
7 proceeds.

8 Overt Act No. 99: On May 20, 2013, in a recorded telephone
9 call, defendant CECILIA VIRGEN directed co-conspirator Frankie
10 Megorado to arrange the assault of J.J. in order to maintain Mexican
11 Mafia LACJ Enterprise discipline.

12 Overt Act No. 100: On May 20, 2013, in a recorded telephone
13 call, co-conspirator Frankie Megorado agreed to arrange the assault
14 of J.J. as directed by defendant CECILIA VIRGEN.

15 Possession of Mexican Mafia LACJ Enterprise Records

16 Overt Act No. 101: On May 22, 2013, defendant CECILIA VIRGEN
17 possessed records of the Mexican Mafia LACJ Enterprise's racketeering
18 activities in LACJ, including drug trafficking and extortion.

19 Smuggling of Methamphetamine, Heroin and Marijuana into LACJ

20 Overt Act No. 102: From May 22, 2013, through May 30, 2013, in
21 recorded telephone conversations, UICC-10 and defendant ANA MARTINEZ
22 coordinated the smuggling of heroin, methamphetamine, and marijuana
23 to UICC-3 in LACJ; UICC-10 directed defendant ANA MARTINEZ to mark
24 the drugs with "Kahn" to indicate that they were for UICC-3; and
25 UICC-10 directed defendant ANA MARTINEZ to package the drugs in the
26 cutoff fingers of black latex gloves.

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1 Overt Act No. 103: On May 23, 2013, defendant ANA MARTINEZ
2 obtained heroin, methamphetamine, and marijuana from an unknown
3 supplier and packaged the drugs for smuggling into LACJ.

4 Overt Act No. 104: From May 2013 through August 7, 2013,
5 defendant ANA MARTINEZ possessed digital scales and narcotics
6 packaging to facilitate the smuggling of drugs into LACJ on behalf of
7 the Mexican Mafia LACJ Enterprise.

8 Money Laundering

9 Overt Act No. 105: On May 24, 2013, in a recorded telephone
10 conversation, UICC-10 directed defendant ANA MARTINEZ to transfer
11 \$500 of Mexican Mafia LACJ Enterprise drug money to co-conspirator
12 Valerie Trejo.

13 Overt Act No. 106: On May 24, 2013, defendant ANA MARTINEZ
14 transferred \$500 of Mexican Mafia LACJ Enterprise drug money to co-
15 conspirator Valerie Trejo via money order.

16 Identity Theft and Access Device Fraud

17 Overt Act No. 107: From May 2013 through at least August 2013,
18 defendant ANA MARTINEZ obtained identity profiles, opened fraudulent
19 Verizon phone accounts based on those profiles, and provided those
20 phone numbers to UICC-10 to give to other Mexican Mafia LACJ
21 Enterprise associates so that they could carry out Mexican Mafia LACJ
22 Enterprise business by making free phone calls.

23 Overt Act No. 108: On August 7, 2013, defendant ANA MARTINEZ
24 possessed in her residence hundreds of stolen identity profiles to
25 use to open fraudulent phone accounts to further Mexican Mafia LACJ
26 Enterprise communications to and from LACJ.

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1 Defendant JOSE LANDA-RODRIGUEZ takes over Mexican Mafia LACJ
2 Enterprise Operations, Including Drug Trafficking and Extortion

3 Overt Act No. 109: Beginning on June 21, 2013, following the
4 death of DMM-1, defendant JOSE LANDA-RODRIGUEZ took over all Mexican
5 Mafia LACJ Enterprise operations within LACJ.

6 Overt Act No. 110: Beginning June 21, 2013, following the death
7 of DMM-1, UICC-9 assumed a position as a top lieutenant to defendant
8 JOSE LANDA-RODRIGUEZ for running Mexican Mafia LACJ Enterprise
9 operations in LACJ.

10 Overt Act No. 111: Beginning June 21, 2013, following the death
11 of DMM-1, co-conspirator Miguel Calderon assumed a position as an
12 out-of-custody "secretary" for defendant JOSE LANDA-RODRIGUEZ to
13 facilitate Mexican Mafia LACJ Enterprise operations in LACJ.

14 Overt Act No. 112: Beginning June 21, 2013, following the death
15 of DMM-1, UICC-4 took over as the shot-caller of the 800 and 900
16 dorms in NCCF to run Mexican Mafia LACJ Enterprise operations for
17 defendant JOSE LANDA-RODRIGUEZ.

18 Overt Act No. 113: Beginning June 26, 2013, following the death
19 of DMM-1, co-conspirator Miguel Garcia took over as the shot-caller
20 of the 500, 600, and 700 dorms in NCCF to run Mexican Mafia LACJ
21 Enterprise operations for defendant JOSE LANDA-RODRIGUEZ.

22 Overt Act No. 114: On June 24, 2013, defendant JOSE LANDA-
23 RODRIGUEZ told defendant SAMANTHA RIVERA that he was taking over all
24 of LACJ and directed defendant SAMANTHA RIVERA to inform co-
25 conspirator Miguel Calderon.

26 Overt Act No. 115: From June 24, 2013, through at least
27 December 18, 2015, defendant SAMANTHA RIVERA passed communications
28 from defendant JOSE LANDA-RODRIGUEZ to other Mexican Mafia members.

1 Overt Act No. 116: On June 28, 2013, co-conspirator Miguel
2 Calderon directed UICC-9 to send the kitty money to a post office box
3 that he controlled and to send the drug and fine money to another
4 post office box that he controlled.

5 Overt Act No. 117: On June 23, 2013, July 6, 2013, and July 26,
6 2013, co-conspirator Miguel Calderon made deposits of approximately
7 \$200 in kitty proceeds into the LACJ inmate trust account of
8 defendant JOSE LANDA-RODRIGUEZ.

9 Smuggling of Methamphetamine into LACJ

10 Overt Act No. 118: From July 24, 2013, through August 14, 2013,
11 defendant MARK LANDEROS and unindicted co-conspirators Kristen Ayala,
12 Jonathan Rodriguez, Bryanna McCullah, Juan NMN Garcia, and unindicted
13 co-conspirator 31 ("UICC-31") arranged to smuggle approximately one
14 ounce of methamphetamine and one ounce of marijuana into LACJ.

15 Overt Act No. 119: On July 25, 2013, in a recorded telephone
16 conversation, defendant MARK LANDEROS asked UICC-31 to smuggle drugs
17 into LACJ.

18 Overt Act No. 120: On August 3, 2013, in a recorded telephone
19 conversation between defendant MARK LANDEROS and unindicted co-
20 conspirators Kristen Ayala and Juan NMN Garcia, defendant MARK
21 LANDEROS asked unindicted co-conspirator Juan NMN Garcia to supply
22 methamphetamine and marijuana, and unindicted co-conspirator Juan NMN
23 Garcia agreed to do so and gave prices for the drugs.

24 Overt Act No. 121: On August 13, 2013, in a recorded telephone
25 conversation, defendant MARK LANDEROS spoke to unindicted co-
26 conspirator Jonathan Rodriguez and gave him instructions regarding
27 the drugs to be smuggled into LACJ.

1 Overt Act No. 122: On August 14, 2013, acting on defendant MARK
2 LANDEROS' instructions, unindicted co-conspirator Jonathan Rodriguez
3 attempted to smuggle into LACJ approximately 22.7 grams of
4 methamphetamine inside his body.

5 Juan Reyes Appointed as Shot-Caller for 800 Floor of NCCF

6 Overt Act No. 123: On or before August 7, 2013, co-conspirator
7 Frankie Megorado sent a kite to co-conspirator Juan Reyes appointing
8 co-conspirator Juan Reyes as shot-caller for the 800 floor of MCJ on
9 behalf of the Mexican Mafia LACJ Enterprise, and providing
10 instructions regarding extortion and discipline.

11 Smuggling of Heroin within LACJ

12 Overt Act No. 124: On September 24, 2013, unindicted co-
13 conspirator 32 ("UICC-32") attempted to smuggle .39 grams of heroin
14 from Twin Towers to co-conspirator Miguel Garcia at NCCF.

15 Laureen Garcia Acts as the Secretary for NCCF and Manuel Jimenez Acts
16 as a Shot-Caller for NCCF by imposing Discipline and Collecting
17 Extortion Proceeds and Laundering Them

18 Overt Act No. 125: In October 2013, co-conspirator Laureen
19 Garcia served as the Mexican Mafia LACJ Enterprise secretary for NCCF
20 and in that capacity ordered assaults as discipline and for
21 violations of Mexican Mafia rules, collected "Green Dot" numbers
22 representing proceeds from Mexican Mafia LACJ Enterprise extortion
23 activities from co-conspirator Manuel Jimenez, and directed co-
24 conspirator Manuel Jimenez to send extortion money to a post office
25 box that co-conspirator Laureen Garcia controlled.

26 Overt Act No. 126: On October 3, 2013, in a recorded telephone
27 conversation, co-conspirator Laureen Garcia appointed co-conspirator
28 Manuel Jimenez and an unindicted co-conspirator known as "Fatboy"

1 from the Blythe Street gang to run Mexican Mafia LACJ Enterprise
2 activities in parts of NCCF.

3 Overt Act No. 127: On October 7, 2013, in a recorded telephone
4 conversation, co-conspirator Manuel Jimenez provided to co-
5 conspirator Laureen Garcia the number to a Green Dot card/account
6 that contained \$100 in Mexican Mafia LACJ Enterprise proceeds.

7 Overt Act No. 128: On October 11, 2013, in a recorded telephone
8 conversation, co-conspirator Laureen Garcia gave the post office box
9 address for kitty money to co-conspirator Manuel Jimenez.

10 Overt Act No. 129: On October 12, 2013, in a recorded telephone
11 conversation, co-conspirator Laureen Garcia ordered co-conspirator
12 Alavaro Leyva to fine a Sureno known as "Oso" \$600 for violating
13 Mexican Mafia LACJ Enterprise rules.

14 Overt Act No. 130: On October 12, 2013, in a recorded telephone
15 conversation, co-conspirator Alavaro Leyva told co-conspirator
16 Laureen Garcia that he would fine the Sureno known as "Oso" \$600 and
17 have him assaulted three times for 39 seconds, and co-conspirator
18 Laureen Garcia agreed.

19 Overt Act No. 131: On October 14, 2013, in a recorded telephone
20 conversation, co-conspirator Laureen Garcia gave the post office box
21 address for kitty money to co-conspirator Alavaro Leyva.

22 Overt Act No. 132: On October 14, 2013, in a recorded telephone
23 conversation, co-conspirator Alavaro Leyva told co-conspirator
24 Laureen Garcia about inmates in NCCF who were causing problems and
25 suggested that they be fined \$1,000.

26 Overt Act No. 133: On October 14, 2013, in a recorded telephone
27 conversation, co-conspirator Laureen Garcia agreed to the \$1,000
28

1 fines for Oso and other inmates who were causing problems in NCCF and
2 ordered that they be assaulted as well.

3 Overt Act No. 134: On October 27, 2013, co-conspirator Laureen
4 Garcia put \$50 on the inmate trust account of defendant JOSE LANDA-
5 RODRIGUEZ.

6 Overt Act No. 135: On November 1, 2013, co-conspirator Laureen
7 Garcia possessed sixty-seven money orders representing \$3,240 in
8 Mexican Mafia LACJ Enterprise proceeds.

9 Assault of Frankie Megorado for Failing to Run Mexican Mafia LACJ
10 Enterprise Drug Trafficking and Extortion, Properly

11 Overt Act No. 136: On or before October 2, 2013, in a recorded
12 telephone conversation, co-conspirator Alavaro Leyva told co-
13 conspirator Laureen Garcia that co-conspirator Frankie Megorado
14 should be assaulted because he was not running Mexican Mafia LACJ
15 Enterprise operations properly, including by not remitting the proper
16 amount of drug and extortion proceeds.

17 Overt Act No. 137: On October 2, 2013, in a recorded telephone
18 conversation, co-conspirator Laureen Garcia ordered co-conspirator
19 Alavaro Leyva to have co-conspirator Frankie Megorado assaulted
20 because he was not running Mexican Mafia LACJ Enterprise operations
21 properly.

22 Overt Act No. 138: On or after October 2, 2013, co-conspirator
23 Alavaro Leyva ordered that co-conspirator Frankie Megorado be
24 assaulted.

25 Overt Act No. 139: On October 5, 2013, unindicted co-
26 conspirators assaulted co-conspirator Frankie Megorado.

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1 Greenlighting of Rafael Carrillo

2 Overt Act No. 140: On or before October 10, 2013, defendant
3 JOSE LANDA-RODRIGUEZ ordered that UICC-1 be seriously assaulted for
4 undermining co-conspirator Gilbert Parra's authority to collect
5 extortion and proceeds.

6 Overt Act No. 141: On October 10, 2013, co-conspirator Gilbert
7 Parra passed on defendant JOSE LANDA-RODRIGUEZ' order that UICC-1 be
8 seriously assaulted to maintain the efficiency of the Mexican Mafia
9 LACJ Enterprise's extortion and drug trafficking activities.

10 Overt Act No. 142: On October 14, 2013, co-conspirator Gilbert
11 Parra attempted to pass on to NCCF orders that UICC-1 be seriously
12 assaulted.

13 Overt Act No. 143: On October 14, 2013, UICC-9 attempted to
14 smuggle into NCCF kites containing orders and instructions from co-
15 conspirator Gilbert Parra and JOSE LANDA-RODRIGUEZ.

16 Conspiracy to Assault J.J. for Interfering with Drug Trafficking and
17 Extortion

18 Overt Act No. 144: From October 10, 2013 through October 21,
19 2013, defendant JOSE LANDA-RODRIGUEZ and co-conspirator Ernesto
20 Vargas ordered that J.J. be assaulted for undermining co-conspirator
21 Miguel Garcia's authority to collect extortion and drug proceeds.

22 Overt Act No. 145: On or before October 23, 2013, J.J. was
23 assaulted on the orders of co-conspirator Ernesto Vargas in order to
24 maintain the efficiency of Mexican Mafia LACJ Enterprise extortion
25 and drug trafficking activities.

26 Overt Act No. 146: On October 23, 2013, in a recorded telephone
27 conversation, co-conspirators Ernesto Vargas and Miguel Garcia
28

1 discussed J.J.'s assault as discipline for questioning co-conspirator
2 Miguel Garcia's status in the Mexican Mafia LACJ Enterprise.

3 Jonathan Verdeja Facilitates Mexican Mafia LACJ Enterprise Activities
4 at NCCF Including Drug Trafficking, Extortion, and Related Money
5 Laundering

6 Overt Act No. 147: From about October 16, 2013, through
7 December 26, 2013, co-conspirator Jonathan Verdeja acted as the
8 facilitator for NCCF on behalf of the Mexican Mafia LACJ Enterprise;
9 co-conspirator Jonathan Verdeja coordinated and collected kitty money
10 and oversaw the distribution of drugs in NCCF.

11 Overt Act No. 148: On October 17, 2013, in recorded telephone
12 conversations, co-conspirator Jonathan Verdeja called unindicted co-
13 conspirator 33 ("UICC-33"), who gave the post office box address for
14 Mexican Mafia LACJ Enterprise money and payments to co-conspirator
15 Jonathan Verdeja, and co-conspirator Jonathan Verdeja agreed to send
16 the payments to that address and directed UICC-33 to pass messages
17 through co-conspirator Jonathan Verdeja's secretary, unindicted co-
18 conspirator 34 ("UICC-34").

19 Overt Act No. 149: On October 18, 2013, in a recorded telephone
20 conversation, co-conspirator Jonathan Verdeja told UICC-34 to open a
21 post office box, told UICC-34 that he will send kitty money to her,
22 and told UICC-34 to put the money on his inmate trust account.

23 Overt Act No. 150: On October 19, 2013, in a recorded telephone
24 conversation, co-conspirator Jonathan Verdeja told UICC-34 to give
25 the post office box address to NCCF shot-callers who will be calling
26 her.

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1 Overt Act No. 151: On October 22, 2013, in a recorded telephone
2 conversation, co-conspirator Jonathan Verdeja told UICC-34 how to
3 instruct NCCF shot-callers to properly fill out money orders.

4 Overt Act No. 152: On October 29, 2013, in a recorded telephone
5 conversation, co-conspirator Jonathan Verdeja told UICC-34 to give
6 the post office box address to "Greedy" and "Laughing Boy;" UICC-34
7 told co-conspirator Jonathan Verdeja that she had already received
8 one money order, that she was unhappy that her name was on it, and
9 that she preferred to deal in Green Dot numbers.

10 Overt Act No. 153: On October 30, 2013, in a recorded telephone
11 conversation, co-conspirator Jonathan Verdeja told UICC-34 that she
12 will be receiving twenty-eight money orders representing proceeds of
13 Mexican Mafia LACJ Enterprise activities.

14 Overt Act No. 154: On November 10, 2013, in a recorded
15 telephone conversation, UICC-34 told co-conspirator Jonathan Verdeja
16 that she had received kitty payments from dorms 822 and 823, and co-
17 conspirator Jonathan Verdeja told her to cash them.

18 Overt Act No. 155: On November 15, 2013, in a recorded
19 telephone conversation, an unidentified female co-conspirator told
20 co-conspirator Jonathan Verdeja that she had eight money orders
21 representing Mexican Mafia LACJ Enterprise proceeds and co-
22 conspirator Jonathan Verdeja told the unidentified female co-
23 conspirator to keep two for herself and he would tell her what to do
24 with the rest.

25 Overt Act No. 156: On November 19, 2013, in a recorded
26 telephone conversation, co-conspirator Jonathan Verdeja told
27 unindicted co-conspirator 35 ("UICC-35") that more money orders will
28 be sent and that they are important.

1 Overt Act No. 157: On November 21, 2013, in a recorded
2 telephone conversation, co-conspirator Jonathan Verdeja reported on
3 how things were going at NCCF to co-conspirator Gilbert Parra and
4 told unindicted co-conspirator 36 ("UICC-36") to give money orders to
5 co-conspirator Gilbert Parra.

6 Overt Act No. 158: On December 1, 2013, in a recorded telephone
7 conversation, co-conspirator Jonathan Verdeja told UICC-35 that she
8 will be receiving more Green Dot numbers and UICC-35 told co-
9 conspirator Jonathan Verdeja that she had five Green Dot numbers and
10 one money order.

11 Overt Act No. 159: On December 4, 2013, in a recorded telephone
12 conversation, UICC-35 told co-conspirator Jonathan Verdeja that she
13 had one Green Dot number, five money orders, and one money-gram and
14 that her Green Dot account had been frozen for potential money
15 laundering.

16 Overt Act No. 160: On December 8, 2013, in a recorded telephone
17 conversation, UICC-35 reported to co-conspirator Jonathan Verdeja
18 that she had ten money orders and one money-gram and co-conspirator
19 Jonathan Verdeja told her to give them to an unidentified co-
20 conspirator.

21 Overt Act No. 161: On December 9, 2013, in a recorded telephone
22 conversation, UICC-36 reported to co-conspirator Jonathan Verdeja
23 that she had twenty money orders and co-conspirator Jonathan Verdeja
24 told UICC-36 to keep one for herself and give the rest to UICC-35.

25 Overt Act No. 162: On December 9, 2013, in a recorded telephone
26 conversation, co-conspirator Jonathan Verdeja told UICC-35 to get
27 nineteen money orders from UICC-36 and to give them to co-conspirator
28 Gilbert Parra.

1 Conspiracy to Assault G.S.

2 Overt Act No. 163: On October 20, 2013, in a recorded telephone
3 conversation, co-conspirator Laureen Garcia ordered that G.S. be
4 assaulted for mentioning defendant JOSE LANDA-RODRIGUEZ' name too
5 much.

6 Possession of Heroin and Mexican Mafia LACJ Enterprise Correspondence
7 within LACJ

8 Overt Act No. 164: On November 5, 2013, an UICC-2 gave six
9 doses of heroin that was prepackaged for sale to unindicted co-
10 conspirator 37 ("UICC-37") to sell to other persons inside LACJ.

11 Overt Act No. 165: On November 5, 2013, UICC-37 possessed six
12 doses of heroin that was prepackaged for sale with intent to sell it
13 to other persons inside LACJ.

14 Overt Act No. 166: On November 5, 2013, UICC-37 transported a
15 kite written by defendant MARK LANDEROS, containing instructions that
16 co-conspirator Luis Garcia was the facilitator for defendant JOSE
17 LANDA-RODRIGUEZ for MCJ and Twin Towers, his orders were to be
18 respected, and anyone expressing disobedience to him should be
19 assaulted for 39 seconds.

20 Possession of Mexican Mafia LACJ Enterprise Correspondence Related to
21 Drug Trafficking and Extortion

22 Overt Act No. 167: On December 4, 2013, co-conspirator Luis
23 Garcia possessed kites directing the activities of the Mexican Mafia
24 LACJ Enterprise inside LACJ, including drug trafficking and
25 Extortion.

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1 Assault of UICC-32 for Losing Mexican Mafia LACJ Enterprise Heroin

2 Overt Act No. 168: On or before October 1, 2013, co-conspirator
3 Miguel Garcia ordered that UICC-32 be assaulted as discipline for
4 losing heroin that belonged to the Mexican Mafia LACJ Enterprise.

5 Overt Act No. 169: On October 1, 2013, in a recorded telephone
6 conversation, co-conspirator Laureen Garcia passed on to co-
7 conspirator Manuel Jimenez co-conspirator Miguel Garcia's order that
8 UICC-32 be assaulted inside LACJ as discipline for losing the heroin
9 he had attempted to smuggle into NCCF.

10 Overt Act No. 170: On or after October 1, 2013, co-conspirator
11 Manuel Jimenez passed along the order to assault UICC-32.

12 Overt Act No. 171: On December 5, 2013, unindicted co-
13 conspirators assaulted UICC-32.

14 Assault of O.A. for Failing to Conduct Mexican Mafia LACJ Enterprise
15 Operations, Including Drug Trafficking and Extortion, Properly

16 Overt Act No. 172: On or before December 12, 2013, co-
17 conspirator Luis Garcia ordered that O.A. be assaulted and replaced
18 as a shot-caller.

19 Overt Act No. 173: On December 12, 2013, unindicted co-
20 conspirators assaulted O.A. to remove him as a shot-caller.

21 Possession of Heroin Within LACJ and Extortion

22 Overt Act No. 174: On or before December 18, 2013, UICC-2
23 arranged for approximately 43.7 grams of heroin to be given to
24 unindicted co-conspirator Jonathan Rodriguez to smuggle into Twin
25 Towers for UICC-2 and co-conspirator Luis Garcia.

26 Overt Act No. 175: On December 18, 2013, unindicted co-
27 conspirator Jonathan Rodriguez possessed approximately 43.7 grams of
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1 heroin with intent to distribute it to others on behalf of defendant
2 JOSE LANDA-RODRIGUEZ.

3 Overt Act No. 176: On or before January 30, 2014, UICC-2 wrote
4 a kite to defendant MARK LANDEROS to explain that unindicted co-
5 conspirator Jonathan Rodriguez had been fined \$5,000 and would have
6 to smuggle more drugs into LACJ because he lost the heroin seized
7 from him on December 18, 2013, and that another Sureno had lost
8 thirds in the form of two grams of methamphetamine.

9 Possession of Mexican Mafia LACJ Enterprise Material

10 Overt Act No. 177: On January 31, 2014, co-conspirator Luis
11 Garcia possessed a razor blade, two pens, and contact information for
12 defendants JOSE LANDA-RODRIGUEZ and SAMANTHA RIVERA and others.

13 Defendant GABRIEL ZENDEJAS-CHAVEZ Hosts an Eme Meeting at his Law
14 Office

15 Overt Act No. 178: On February 4, 2014, defendant GABRIEL
16 ZENDEJAS-CHAVEZ met with defendant RAFAEL LEMUS, co-conspirator
17 Miguel Rodriguez, DMM-2, and others in defendant GABRIEL ZENDEJAS-
18 CHAVEZ's law office to discuss Eme business, including the passing of
19 messages to Eme members in California State Prison by defendant
20 GABRIEL ZENDEJAS-CHAVEZ, the passing of messages to defendant JOSE
21 LANDA-RODRIGUEZ, obtaining drugs for DMM-2 to have sold, and problems
22 La Eme was having with A.E., an Eme member in bad standing, and his
23 brother G.E.

24 Possession of Mexican Mafia LACJ Correspondence

25 Overt Act No. 179: On February 17, 2014, co-conspirator Luis
26 Garcia possessed kites that discussed Mexican Mafia sanctioned
27 assaults, the identity of Mexican Mafia LACJ Enterprise leaders
28 within LACJ, and reflected that co-conspirator Luis Garcia was the

1 highest ranking shot-caller in LACJ for defendant JOSE LANDA-
2 RODRIGUEZ.

3 Defendant GABRIEL ZENDEJAS-CHAVEZ Uses His Status as an Attorney to
4 Meet With and Pass Messages to Mexican Mafia Members in Pelican Bay
5 State Prison

6 Overt Act No. 180: On February 18, 2014, defendant GABRIEL
7 ZENDEJAS-CHAVEZ used his status as an attorney to visit and pass
8 messages to Mexican Mafia member 1, Mexican Mafia member 2, Mexican
9 Mafia member 3, Mexican Mafia member 4, and Mexican Mafia member 5.

10 Overt Act No. 181: On February 18, 2014, defendant GABRIEL
11 ZENDEJAS-CHAVEZ attempted to smuggle a written message to a Mexican
12 Mafia member at the Security Housing Unit at Pelican Bay State
13 Prison.

14 Overt Act No. 182: On February 19, 2014, defendant GABRIEL
15 ZENDEJAS-CHAVEZ used his status as an attorney to visit and pass
16 messages to Mexican Mafia member 6, Mexican Mafia member 7, Mexican
17 Mafia member 8, Mexican Mafia member 9, and Mexican Mafia member 10.

18 Defendant GABRIEL ZENDEJAS-CHAVEZ and UICC-38 Discuss Collecting and
19 Laundering Mexican Mafia LACJ Enterprise Proceeds

20 Overt Act No. 183: On March 27, 2014, defendant GABRIEL
21 ZENDEJAS-CHAVEZ, via text-message, directed UICC-38 to bring kitty
22 proceeds to his law office.

23 Overt Act No. 184: On April 9, 2014, defendant GABRIEL
24 ZENDEJAS-CHAVEZ, via text-message, directed UICC-38 to send him
25 \$1,000.

26 Overt Act No. 185: On April 9, 2014, defendant GABRIEL
27 ZENDEJAS-CHAVEZ, via text-message, agreed to deliver \$300 to each of
28

1 two Mexican Mafia members at the ADX Florence federal prison in
2 Colorado.

3 Overt Act No. 186: On April 10, 2014, defendant GABRIEL
4 ZENDEJAS-CHAVEZ exchanged text messages with UICC-38 in which he
5 agreed to deliver \$400 to two persons in Colorado and to keep \$200
6 for himself.

7 Overt Act No. 187: On April 12, 2014, defendant GABRIEL
8 ZENDEJAS-CHAVEZ travelled to the ADX Florence federal prison in
9 Colorado to visit Mexican Mafia member 11.

10 Overt Act No. 188: On April 14, 2014, defendant GABRIEL
11 ZENDEJAS-CHAVEZ, via text-message, provided co-conspirator Donato
12 Gonzales's name and booking number to UICC-38 so she could forward
13 Mexican Mafia LACJ Enterprise proceeds to co-conspirator Donato
14 Gonzales.

15 Overt Act No. 189: On April 18, 2014, defendant GABRIEL
16 ZENDEJAS-CHAVEZ told UICC-38 that he had money to return to her
17 because one of the Mexican Mafia members in Colorado could not have
18 visitors.

19 Defendant GABRIEL ZENDEJAS-CHAVEZ Facilitates the Extortion of the
20 Mongols Outlaw Motorcycle Gang and the Intimidation of a Victim of a
21 Jail Stabbing

22 Overt Act No. 190: On April 8, 2014, defendant GABRIEL
23 ZENDEJAS-CHAVEZ used his status as an attorney to meet co-conspirator
24 Luis Garcia and discuss Mexican Mafia business including the Mexican
25 Mafia's extortion of the Mongols outlaw motorcycle gang and that they
26 would be extorting the Mongols outlaw motorcycle gang for \$100,000.

27 Overt Act No. 191: On April 8, 2014, defendant GABRIEL
28 ZENDEJAS-CHAVEZ agreed to travel to Pelican Bay State Prison on June

1 25, 2014, to get support for the extortion proposal from other
2 Mexican Mafia members.

3 Overt Act No. 192: On April 8, 2014, defendant GABRIEL
4 ZENDEJAS-CHAVEZ agreed to contact unindicted co-conspirator 39
5 ("UICC-39") to tell co-conspirator Luis Garcia's stabbing victim,
6 M.A., not to cooperate with law enforcement in exchange for being
7 taken off the "Green Light" list.

8 Overt Act No. 193: On April 8, 2014, defendant GABRIEL
9 ZENDEJAS-CHAVEZ explained to co-conspirator Luis Garcia how to use
10 the legal system to delay his trial in order to remain in LACJ as a
11 facilitator.

12 Overt Act No. 194: On April 9, 2014, defendant GABRIEL
13 ZENDEJAS-CHAVEZ, via text-message, directed UICC-38 to send him
14 \$1,000 and UICC-39's phone number per the instructions of defendant
15 LUIS GARCIA.

16 Overt Act No. 195: On April 23, 2014, via text-message, UICC-38
17 sent defendant GABRIEL ZENDEJAS-CHAVEZ a phone number for the
18 national president of the Mongols outlaw motorcycle gang.

19 Overt Act No. 196: On June 25, 2014, defendant GABRIEL
20 ZENDEJAS-CHAVEZ used his status as an attorney to meet with and pass
21 messages to Mexican Mafia member 1, Mexican Mafia member 4, Mexican
22 Mafia member 6, Mexican Mafia member 8, and Mexican Mafia member 10
23 at Pelican Bay State Prison.

24 Possession of Mexican Mafia LACJ Enterprise Correspondence Discussing
25 Drug Trafficking and Extortion

26 Overt Act No. 197: On April 14, 2014, co-conspirator Luis
27 Garcia possessed in his cell in LACJ two razor blades, a syringe, and
28 more than 100 kites discussing Mexican Mafia LACJ Enterprise

1 business, including: (1) co-conspirator Luis Garcia's status as the
2 highest ranking shot-caller in LACJ; (2) the smuggling of drugs into
3 LACJ; (3) the thirds tax; (4) Green Dot numbers reflecting Mexican
4 Mafia LACJ Enterprise proceeds; and (5) a request from defendant
5 ALVINO MUNOZ that he be allowed to play a larger role in the
6 smuggling of drugs into LACJ on behalf of the Mexican Mafia LACJ
7 Enterprise.

8 Defendant MARK LANDEROS Collects Thirds Taxes

9 Overt Act No. 198: On February 13, 2014, defendant MARK
10 LANDEROS taxed R.H. the amount of approximately one-third of R.H.'s
11 drugs for the right to sell the remainder in LACJ.

12 Overt Act No. 199: On February 14, 2014, defendant MARK
13 LANDEROS taxed J.B. the amount of approximately one-third of J.B.'s
14 drugs for the right to sell the remainder in LACJ.

15 Overt Act No. 200: On February 14, 2014, defendant MARK
16 LANDEROS taxed U.R. the amount of approximately one-third of U.R.'s
17 drugs for the right to sell the remainder in LACJ.

18 Overt Act No. 201: On February 18, 2014, defendant MARK
19 LANDEROS taxed M.V. the amount of approximately one-third of M.V.'s
20 drugs for the right to sell the remainder in LACJ.

21 Overt Act No. 202: On March 1, 2014, defendant MARK LANDEROS
22 taxed L.M. the amount of approximately one-third of L.M.'s drugs for
23 the right to sell the remainder in LACJ.

24 Overt Act No. 203: On March 2, 2014, defendant MARK LANDEROS
25 taxed P.C.-2 the amount of approximately one-third of P.C.-2's drugs
26 for the right to sell the remainder in LACJ.

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1 Overt Act No. 204: On March 9, 2014, defendant MARK LANDEROS
2 taxed G.P. the amount of approximately one-third of G.P.'s drugs for
3 the right to sell the remainder in LACJ.

4 Overt Act No. 205: On March 9, 2014, defendant MARK LANDEROS
5 accepted drugs that were confiscated by an unidentified unindicted
6 co-conspirator from a Sureno who did not pay the thirds tax.

7 Overt Act No. 206: On March 10, 2014, defendant MARK LANDEROS
8 taxed G.M. the amount of approximately one-third of G.M.' drugs for
9 the right to sell the remainder in LACJ.

10 Overt Act No. 207: On March 11, 2014, defendant MARK LANDEROS
11 taxed J.G. the amount of approximately one-third of J.G.'s drugs for
12 the right to sell the remainder in LACJ.

13 Overt Act No. 208: On March 11, 2014, defendant MARK LANDEROS
14 taxed N.G. the amount of approximately one-third of N.G.'s drugs for
15 the right to sell the remainder in LACJ.

16 Overt Act No. 209: On March 13, 2014, defendant MARK LANDEROS
17 taxed J.S.-2 the amount of approximately one-third of J.S.-2's drugs
18 for the right to sell the remainder in LACJ.

19 Overt Act No. 210: On March 15, 2014, defendant MARK LANDEROS
20 taxed R.V. the amount of approximately one-third of R.V.'s drugs for
21 the right to sell the remainder in LACJ.

22 Overt Act No. 211: On March 16, 2014, defendant MARK LANDEROS
23 taxed D.A. the amount of approximately one-third of D.A.'s drugs for
24 the right to sell the remainder in LACJ.

25 Overt Act No. 212: On March 17, 2014, defendant MARK LANDEROS
26 taxed R.R. the amount of approximately one-third of R.R.'s drugs for
27 the right to sell the remainder in LACJ.

1 Overt Act No. 213: On March 19, 2014, defendant MARK LANDEROS
2 taxed H.G. the amount of approximately one-third of H.G.'s drugs for
3 the right to sell the remainder in LACJ.

4 Overt Act No. 214: On March 19, 2014, defendant MARK LANDEROS
5 taxed D.A. the amount of approximately one-third of D.A.'s drugs for
6 the right to sell the remainder in LACJ.

7 Overt Act No. 215: On March 23, 2014, defendant MARK LANDEROS
8 taxed M.M. the amount of approximately one-third of M.M.'s drugs for
9 the right to sell the remainder in LACJ.

10 Overt Act No. 216: On March 25, 2014, defendant MARK LANDEROS
11 taxed J.E. the amount of approximately one-third of J.E.'s drugs for
12 the right to sell the remainder in LACJ.

13 Overt Act No. 217: On March 25, 2014, defendant MARK LANDEROS
14 taxed J.A. the amount of approximately one-third of J.A.'s drugs for
15 the right to sell the remainder in LACJ.

16 Overt Act No. 218: On April 4, 2014, defendant MARK LANDEROS
17 taxed J.M.-4 the amount of approximately one-third of J.M.-4's drugs
18 for the right to sell the remainder in LACJ.

19 Overt Act No. 219: On April 8, 2014, defendant MARK LANDEROS
20 taxed J.S.-2 the amount of approximately one-third of J.S.-2's drugs
21 for the right to sell the remainder in LACJ.

22 Overt Act No. 220: On April 8, 2014, defendant MARK LANDEROS
23 taxed J.H. the amount of approximately one-third of J.H.'s drugs for
24 the right to sell the remainder in LACJ.

25 Overt Act No. 221: On April 13, 2014, defendant MARK LANDEROS
26 taxed R.O. the amount of approximately one-third of R.O.'s drugs for
27 the right to sell the remainder in LACJ.

1 Overt Act No. 222: On April 14, 2014, defendant MARK LANDEROS
2 taxed L.O. the amount of approximately one-third of L.O.'s drugs for
3 the right to sell the remainder in LACJ.

4 Overt Act No. 223: On April 15, 2014, defendant MARK LANDEROS
5 taxed J.P. the amount of approximately one-third of J.P.'s drugs for
6 the right to sell the remainder in LACJ.

7 Overt Act No. 224: On April 16, 2014, defendant MARK LANDEROS
8 taxed F.M. the amount of approximately one-third of F.M.'s drugs for
9 the right to sell the remainder in LACJ.

10 Overt Act No. 225: On April 16, 2014, defendant MARK LANDEROS
11 taxed M.G. the amount of approximately one-third of M.G.'s drugs for
12 the right to sell the remainder in LACJ.

13 Overt Act No. 226: On April 17, 2014, defendant MARK LANDEROS
14 taxed S.M. the amount of approximately one-third of S.M.'s drugs for
15 the right to sell the remainder in LACJ.

16 Overt Act No. 227: On April 18, 2014, defendant MARK LANDEROS
17 taxed R.E. the amount of approximately one-third of R.E.'s drugs for
18 the right to sell the remainder in LACJ.

19 Overt Act No. 228: On April 22, 2014, defendant MARK LANDEROS
20 taxed R.A. the amount of approximately one-third of R.A.'s drugs for
21 the right to sell the remainder in LACJ.

22 Overt Act No. 229: On April 24, 2014, defendant MARK LANDEROS
23 taxed R.C. the amount of approximately one-third of R.C.'s drugs for
24 the right to sell the remainder in LACJ.

25 Overt Act No. 230: On April 24, 2014, defendant MARK LANDEROS
26 taxed co-conspirator Miguel Garcia the amount of approximately one-
27 third of co-conspirator Miguel Garcia's drugs for the right to sell
28 the remainder in LACJ.

1 Overt Act No. 231: On April 26, 2014, defendant MARK LANDEROS
2 taxed P.M. the amount of approximately one-third of P.M.'s drugs for
3 the right to sell the remainder in LACJ.

4 Overt Act No. 232: On April 28, 2014, defendant MARK LANDEROS
5 possessed a ledger detailing his collection of the thirds tax.
6 Attempted Murder of J.B.-2 and Kidnapping and Assault and Attempted
7 Murder of C.R.

8 Overt Act No. 233: On December 16, 2013, an unidentified co-
9 conspirator repeatedly stabbed J.B.-2 in the head on defendant JOSE
10 LANDA-RODRIGUEZ's orders, in retaliation for co-conspirator Alvaro
11 Ruiz defying defendant JOSE LANDA-RODRIGUEZ.

12 Overt Act No. 234: On or before April 21, 2014, defendant JOSE
13 LANDA-RODRIGUEZ sanctioned a kidnapping of C.R. in retaliation for
14 co-conspirator Alvaro Ruiz defying defendant JOSE LANDA-RODRIGUEZ.

15 Overt Act No. 235: On April 21, 2014, defendant DAVID DIAZ sent
16 a coded text message to co-conspirator Diana Martinez stating that
17 C.R. needed to be assaulted on Mexican Mafia LACJ Enterprise orders.

18 Overt Act No. 236: On April 22, 2014, defendant DAVID DIAZ and
19 co-conspirator Diana Martinez picked up C.R. from C.R.'s residence in
20 the City of Pomona and drove C.R. to co-conspirator David
21 Villalobos's residence in San Bernardino County so that co-
22 conspirator David Villalobos could detain and assault C.R.

23 Overt Act No. 237: On April 22, 2014, co-conspirator David
24 Villalobos obtained duct tape and attempted to restrain C.R. in the
25 garage of his residence in San Bernardino County so that he could
26 kill C.R.

27 Overt Act No. 238: On April 22, 2014, co-conspirator David
28 Villalobos assaulted C.R. with the intent to kill C.R.

1 Smuggling of Heroin and Methamphetamine into LACJ

2 Overt Act No. 239: From April 18, 2014, through April 20, 2014,
3 defendant GABRIEL ZENDEJAS-CHAVEZ, co-conspirators Donato Gonzales
4 and Alvaro Ruiz, and unindicted co-conspirator Frank Herrera,
5 arranged for heroin and methamphetamine to be smuggled into MCJ.

6 Overt Act No. 240: On April 22, 2014, unindicted co-conspirator
7 Martin Salazar possessed and hid approximately 2.37 grams of heroin
8 and 7.75 grams of methamphetamine that had been smuggled into LACJ by
9 unindicted co-conspirator Ramon Amaya on behalf of the Mexican Mafia
10 LACJ Enterprise.

11 Overt Act No. 241: Between April 25, 2014, and May 9, 2014, co-
12 conspirator Donato Gonzales wrote a kite to co-conspirator Luis
13 Garcia that the "legal team" had sent drugs to co-conspirator Donato
14 Gonzales and asked co-conspirator Luis Garcia to look out for those
15 drugs.

16 Overt Act No. 242: On June 2, 2014, co-conspirator Donato
17 Gonzales wrote a coded letter, disguised as legal mail, to defendant
18 GABRIEL ZENDEJAS-CHAVEZ stating that he had not received the heroin
19 and methamphetamine.

20 Defendant GABRIEL ZENDEJAS-CHAVEZ Uses His Status as an Attorney to
21 Pass Mexican Mafia Orders Regarding Assaults, Murder, and Drug
22 Trafficking

23 Overt Act No. 243: On April 22, 2014, defendant GABRIEL
24 ZENDEJAS-CHAVEZ used his status as an attorney to meet with co-
25 conspirator Luis Garcia and pass an order that "Dreamer" from the
26 18th Street gang, "Demon" from 18th Street gang, and "Blanco" from
27 the VNE gang be assaulted or killed, pass messages from Mexican Mafia
28 members at the ADX Florence federal prison, discuss other Mexican

1 Mafia business including obtaining drugs from Mexican drug cartels,
2 and report that he would be travelling to Mexico to work on an
3 alliance with a drug cartel.

4 Overt Act No. 244: Between May 5, 2014, and May 11, 2014,
5 defendant GABRIEL ZENDEJAS-CHAVEZ travelled to Mexico.
6 Defendant GABRIEL ZENDEJAS-CHAVEZ Used his Status to Pass Mexican
7 Mafia Messages to JOSE LANDA-RODRIGUEZ

8 Overt Act No. 245: On April 22, 2014, defendant GABRIEL
9 ZENDEJAS-CHAVEZ used his status as an attorney to meet with defendant
10 JOSE LANDA-RODRIGUEZ and pass a message from Mexican Mafia member 11
11 that Federal Mexican Mafia members would not be recognizing three
12 State Mexican Mafia members as brothers.

13 Overt Act No. 246: On April 22, 2014, during his meeting with
14 defendant JOSE LANDA-RODRIGUEZ, defendant GABRIEL ZENDEJAS-CHAVEZ
15 passed a message from DMM-2 about removing A.E. from Mexican Mafia
16 membership.

17 Overt Act No. 247: Between April 22, 2014, and April 25, 2014,
18 defendant JOSE LANDA-RODRIGUEZ passed a message to co-conspirator
19 Donato Gonzales to confirm that A.E. was being removed from Mexican
20 Mafia membership.

21 Overt Act No. 248: From April 25, 2014, through May 9, 2014,
22 defendant JOSE LANDA-RODRIGUEZ directed co-conspirator Luis Garcia to
23 have defendant GABRIEL ZENDEJAS-CHAVEZ use his status as an attorney
24 to obtain documentation that a Mexican Mafia associate was
25 cooperating with law enforcement to justify the murder of that
26 Mexican Mafia associate.

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1 Possession of Methamphetamine

2 Overt Act No. 249: On April 30, 2014, co-conspirator Diana
3 Martinez drove co-conspirator Gerardo Tapia to pick up approximately
4 four pounds, or 1,746 grams, of methamphetamine for further
5 distribution.

6 Overt Act No. 250: On April 30, 2014, co-conspirator Gerardo
7 Tapia possessed approximately four pounds, or 1,746 grams, of
8 methamphetamine for further distribution.

9 Defendant GABRIEL ZENDEJAS-CHAVEZ Uses His Status as an Attorney to
10 Discuss Mexican Mafia Business

11 Overt Act No. 251: On April 28, 2014, and May 5, 2014,
12 defendant GABRIEL ZENDEJAS-CHAVEZ used his status as an attorney to
13 meet separately with defendant JOSE LANDA-RODRIGUEZ and co-
14 conspirators Luis Garcia and Donato Gonzales, and at LACJ.

15 Overt Act No. 252: On April 28, 2014, and May 5, 2014, in
16 meetings at LACJ, defendant GABRIEL ZENDEJAS-CHAVEZ informed co-
17 conspirator Luis Garcia: that Federal Mexican Mafia members at the
18 ADX Florence federal prison had not voted for Mexican Mafia
19 membership for "Psycho"; that Mexican Mafia member 11 had placed
20 "Wolf" in charge of the 18th Street gang; that Mexican Mafia member 9
21 had advised that Deceased Mexican Mafia members 3 and 4 were feuding,
22 and to not get dragged into the feud; and to hold off on the assaults
23 of "Dreamer" from the 18th Street gang, "Demon" from 18th Street
24 gang, and "Blanco" from the VNE gang, that they had previously
25 discussed.

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1 Possession of Methamphetamine, Including Methamphetamine to be
2 Smuggled into LACJ

3 Overt Act No. 253: On May 9, 2014, co-conspirator Gerardo Tapia
4 possessed approximately 558.6 grams of methamphetamine in his
5 residence with the intent to distribute the methamphetamine,
6 including to smuggle some of it into LACJ.

7 Overt Act No. 254: On May 9, 2014, DMM-2 possessed, in co-
8 conspirator Gerardo Tapia's residence, a letter concerning Mexican
9 Mafia business written by DMM-2 and Green Dot numbers related to
10 Mexican Mafia LACJ Enterprise activities.

11 JOSE LANDA-RODRIGUEZ Orders the Assault of MARK LANDEROS and the
12 Distribution of Mexican Mafia Proceeds

13 Overt Act No. 255: Between April 25, 2014, and May 9, 2014,
14 defendant JOSE LANDA-RODRIGUEZ ordered co-conspirator Luis Garcia to
15 assault and fine defendant MARK LANDEROS for violating Mexican Mafia
16 rules, to remove him as the shot-caller, and to place another person
17 as a shot-caller.

18 Overt Act No. 256: Between April 25, 2014, and May 9, 2014,
19 defendant JOSE LANDA-RODRIGUEZ directed the payment of thousands of
20 dollars of Mexican Mafia proceeds to other members.

21 Defendant GABRIEL ZENDEJAS-CHAVEZ Informs Others that Luis Garcia had
22 Dropped Out of the Mexican Mafia

23 Overt Act No. 257: On May 28, 2014, in a recorded telephone
24 call, defendants GABRIEL ZENDEJAS-CHAVEZ and JOSE LANDA-RODRIGUEZ
25 discussed the fact that co-conspirator Luis Garcia had "dropped-out"
26 of the Mexican Mafia and should not be included in Mexican Mafia
27 business any longer.

1 Overt Act No. 258: From May 28, 2014, through at least May 30,
2 2014, defendant GABRIEL ZENDEJAS-CHAVEZ informed other co-
3 conspirators that co-conspirator Luis Garcia had "dropped-out" of the
4 Mexican Mafia.

5 Overt Act No. 259: Between May 18, 2014, and July 16, 2014,
6 defendant GABRIEL ZENDEJAS-CHAVEZ wrote, in correspondence disguised
7 as legal mail, to Mexican Mafia member 12 at Pelican Bay State Prison
8 that co-conspirator Luis Garcia had "dropped-out" of the Mexican
9 Mafia.

10 HECTOR DUARTE and NANCY DUARTE Carry out Mexican Mafia LACJ
11 Enterprise Business at NCCF on behalf of DMM-2

12 Overt Act No. 260: From at least July 6, 2014, through November
13 10, 2014, DMM-2 directed defendant HECTOR DUARTE to run NCCF on
14 behalf of the Mexican Mafia LACJ Enterprise; defendant HECTOR DUARTE
15 collected kitty money, assigned fines as discipline, ordered assaults
16 to maintain discipline, and passed messages to defendant NANCY DUARTE
17 to be passed to DMM-2's secretary, co-conspirator Miguel Rodriguez.

18 Overt Act No. 261: From at least July 6, 2014, through October
19 23, 2014, defendant NANCY DUARTE assisted defendant HECTOR DUARTE in
20 running the Mexican Mafia LACJ Enterprise's activities in NCCF on
21 behalf of DMM-2, including by passing messages between defendant
22 HECTOR DUARTE and co-conspirator Miguel Rodriguez, who was DMM-2's
23 secretary.

24 Overt Act No. 262: On July 6, 2014, in a recorded telephone
25 conversation, defendant HECTOR DUARTE told defendant NANCY DUARTE
26 that, based on information from co-conspirator Chris Ferreira, an
27 unknown Hispanic gang member was to be assaulted and extorted for
28 \$1,000 for dealing with African-American inmates.

1 Overt Act No. 263: On July 25, 2014, in a recorded telephone
2 conversation, co-conspirator Chris Ferreira relayed Green-Dot card
3 numbers to defendant NANCY DUARTE representing \$425 in Mexican Mafia
4 LACJ Enterprise extortion money.

5 Overt Act No. 264: On August 4, 2014, defendant NANCY DUARTE
6 directed an unknown floor shot-caller within NCCF to send
7 "everything," that is, the drug and extortion money, to defendant
8 HECTOR DUARTE because defendant HECTOR DUARTE was in charge of NCCF
9 for DMM-2.

10 Overt Act No. 265: On August 6, 2014, defendant HECTOR DUARTE
11 gave defendant NANCY DUARTE a Green Dot number representing kitty
12 proceeds.

13 Overt Act No. 266: On August 15, 2014, in a recorded telephone
14 conversation, defendants HECTOR DUARTE and NANCY DUARTE, and co-
15 conspirator Miguel Rodriguez, discussed Mexican Mafia LACJ Enterprise
16 matters including defendant NANCY DUARTE giving co-conspirator Miguel
17 Rodriguez Green Dot numbers representing proceeds from Mexican Mafia
18 LACJ Enterprise activities, and discipline to be imposed on an
19 unknown Hispanic gang member because the unknown Hispanic gang member
20 had "dropped-out" and gone into protective custody.

21 Overt Act No. 267: On August 15, 2014, in a recorded telephone
22 conversation, defendant HECTOR DUARTE asked co-conspirator Miguel
23 Rodriguez how much discipline to impose on an unknown Hispanic gang
24 member, and co-conspirator Miguel Rodriguez conferred with DMM-2 then
25 told defendant HECTOR DUARTE how to administer discipline and to
26 decide on an amount for a fine.

27 Overt Act No. 268: On August 15, 2014, in a recorded telephone
28 conversation, defendant HECTOR DUARTE stated that he would impose a

1 \$10,000 fine and order that an unknown Hispanic gang member be beaten
2 three times for 39 seconds.

3 Overt Act No. 269: On August 15, 2014, in a recorded telephone
4 conversation, co-conspirator Miguel Rodriguez directed defendant
5 HECTOR DUARTE to control the Mexican Mafia LACJ Enterprise's
6 activities in the south and north facilities of NCCF.

7 Overt Act No. 270: On August 15, 2014, in a recorded telephone
8 conversation, defendant NANCY DUARTE relayed messages between
9 defendant HECTOR DUARTE and co-conspirators Miguel Rodriguez and DMM-
10 2 about discipline of an unknown Hispanic gang member and other
11 Mexican Mafia LACJ Enterprise business.

12 Overt Act No. 271: On August 20, 2014, in a recorded telephone
13 conversation, defendants HECTOR DUARTE and NANCY DUARTE, and co-
14 conspirator Miguel Rodriguez, discussed Mexican Mafia LACJ Enterprise
15 matters; defendant HECTOR DUARTE gave defendant NANCY DUARTE Green
16 Dot numbers representing kitty proceeds; co-conspirator Miguel
17 Rodriguez told defendant HECTOR DUARTE that DMM-2 was upset about not
18 receiving \$10,000 in fine money and that the north facility of NCCF
19 was a month behind in making their payments; and co-conspirator
20 Miguel Rodriguez informed defendant HECTOR DUARTE that DMM-2 wanted
21 the shot-caller for the north facility to be changed.

22 Overt Act No. 272: On August 31, 2014, in a recorded telephone
23 call, defendant HECTOR DUARTE relayed Green Dot card numbers to
24 defendant NANCY DUARTE representing \$385 in Mexican Mafia LACJ
25 Enterprise extortion money.

26 Overt Act No. 273: On August 31, 2014, in a recorded telephone
27 call, defendant HECTOR DUARTE directed defendant NANCY DUARTE that a
28

1 Sureno was to be assaulted for losing Mexican Mafia LACJ Enterprise
2 extortion money.

3 Overt Act No. 274: On October 23, 2014, defendant NANCY DUARTE
4 possessed ledgers containing her records of Mexican Mafia LACJ
5 Enterprise kitty, drug, and fine debts and payments.
6 Directions to Send Mexican Mafia LACJ Enterprise Business and
7 Proceeds Through Defendant GABRIEL ZENDEJAS-CHAVEZ

8 Overt Act No. 275: On August 30, 2014, unindicted co-
9 conspirator 43 ("UICC-43") possessed a kite written by another
10 unknown co-conspirator directing that Mexican Mafia LACJ Enterprise
11 proceeds from drug sales in LACJ and kitty money from LACJ should be
12 sent to defendant GABRIEL ZENDEJAS-CHAVEZ and directing that co-
13 conspirator Ernesto Vargas be recognized as having the authority to
14 run NCCF.

15 Assault and Extortion of M.C. for Interfering with Mexican Mafia LACJ
16 Enterprise Extortion

17 Overt Act No. 276: From August 20, 2014, and September 26,
18 2014, defendants DAVID BERNARDINO, HECTOR DUARTE, and NANCY DUARTE,
19 and co-conspirator Gail Ponce, processed the proceeds of the Mexican
20 Mafia LACJ Enterprises extortion and drug trafficking activities
21 using Green Dot accounts.

22 Overt Act No. 277: On September 1, 2014, in a recorded
23 telephone call, defendant DAVID BERNARDINO reported to co-conspirator
24 Gail Ponce that a Paisa was taxing inmates and asked co-conspirator
25 Gail Ponce to get instructions from defendants HECTOR DUARTE and
26 NANCY DUARTE as to how to deal with the Paisa.

27 Overt Act No. 278: On September 1 or 2, 2014, co-conspirator
28 Gail Ponce told defendant NANCY DUARTE that defendant DAVID

1 BERNARDINO wanted instructions on how to deal with the Paisa who was
2 taxing inmates.

3 Overt Act No. 279: On September 2, 2014, in a recorded
4 telephone call, defendant NANCY DUARTE told defendant HECTOR DUARTE
5 about the Paisa who was taxing inmates and asked if defendant HECTOR
6 DUARTE wanted the Paisa to be assaulted.

7 Overt Act No. 280: On September 2, 2014, in a recorded
8 telephone call, defendant HECTOR DUARTE told defendant NANCY DUARTE
9 that defendant DAVID BERNARDINO should investigate which Mexican
10 Mafia member the Paisa claims to work for and to assault the Paisa
11 for 39 seconds.

12 Overt Act No. 281: On September 2 or 3, 2014, defendant NANCY
13 DUARTE passed along to co-conspirator Gail Ponce defendant HECTOR
14 DUARTE's message that defendant DAVID BERNARDINO should investigate
15 which Mexican Mafia member the Paisa claims to work for and to
16 assault the Paisa for 39 seconds.

17 Overt Act No. 282: On September 3, 2014, in a recorded
18 telephone call, co-conspirator Gail Ponce passed along to defendant
19 DAVID BERNARDINO defendant HECTOR DUARTE's message that defendant
20 DAVID BERNARDINO should investigate which Mexican Mafia member the
21 Paisa claimed to work for and to assault the Paisa for 39 seconds.

22 Overt Act No. 283: On September 3 or 4, 2014, defendant DAVID
23 BERNARDINO ordered that the Paisa, now known to be M.C., be
24 assaulted.

25 Overt Act No. 284: On September 4, 2014, unindicted co-
26 conspirators assaulted M.C. as discipline for disrespecting Mexican
27 Mafia LACJ Enterprise's authority.
28

1 Overt Act No. 285: On September 5, 2014, in a recorded
2 telephone call, defendant DAVID BERNARDINO reported to co-conspirator
3 Gail Ponce that the Paisa, Marco Calderon, had been assaulted, but
4 that the assault was not completed because Marco Calderon screamed
5 and deputies interceded before the assault "could really get going."
6 Assault of E.O to Collect an Extortion Debt

7 Overt Act No. 286: On September 7, 2014, in a recorded
8 telephone call, co-conspirator Miguel Rodriguez directed defendant
9 HECTOR DUARTE to have E.O. assaulted for failing to pay the Mexican
10 Mafia LACJ Enterprise's thirds tax and for lying about doing so under
11 the authority of another Mexican Mafia member.

12 Overt Act No. 287: On September 8, 2014, defendant HECTOR
13 DUARTE ordered that E.O. be assaulted and his drugs were to be
14 confiscated because E.O. had lied about another Mexican Mafia member
15 "blessing" the drugs.

16 Overt Act No. 288: On September 9, 2014, unindicted co-
17 conspirators assaulted E.O. as discipline for violating Mexican Mafia
18 LACJ Enterprise rules.

19 Overt Act No. 289: On September 11, 2014, unindicted co-
20 conspirators assaulted E.O. as discipline for violating Mexican Mafia
21 LACJ Enterprise rules.

22 Conspiracy to Remove Mexican Mafia Member A.E. From Power and to Take
23 Over His Territories

24 Overt Act No. 290: On or before April 25, 2014, defendant JOSE
25 LANDA-RODRIGUEZ wrote a kite to co-conspirator Donato Gonzales to
26 inform him that defendant JOSE LANDA-RODRIGUEZ, DMM-2, and other
27 Mexican Mafia members intended to strip Mexican Mafia membership from
28 A.E.

1 Overt Act No. 291: On or before April 25, 2014, defendant JOSE
2 LANDA-RODRIGUEZ wrote a kite to co-conspirator Luis Garcia to inform
3 him that defendant JOSE LANDA-RODRIGUEZ, DMM-2, and other Mexican
4 Mafia members intended to strip Mexican Mafia membership from A.E.

5 Overt Act No. 292: On or before April 25, 2014, defendant
6 GABRIEL ZENDEJAS-CHAVEZ passed a message from DMM-2 to defendant JOSE
7 LANDA-RODRIGUEZ regarding the decision to strip Mexican Mafia
8 membership from A.E.

9 Overt Act No. 293: On June 30, 2014, in a recorded telephone
10 conversation, defendant JOSE LANDA-RODRIGUEZ and unindicted co-
11 conspirator 45 ("UICC-44") discussed threatening the life of D.C.
12 because of his alignment with Mexican Mafia member A.E. and his
13 collecting of taxes in areas controlled by defendant JOSE LANDA-
14 RODRIGUEZ.

15 Overt Act No. 294: In or around August 2014, defendants GABRIEL
16 ZENDEJAS-CHAVEZ and RAFAEL LEMUS, and co-conspirators Ernesto Vargas
17 and Miguel Rodriguez met at defendant GABRIEL ZENDEJAS-CHAVEZ's law
18 office and discussed A.E. being removed from the Mexican Mafia and
19 other members taking over his territories.

20 Overt Act No. 295: On September 14, 2014, an unknown co-
21 conspirator killed D.C. because of his alignment with A.E. and his
22 collection of taxes in areas controlled by defendant JOSE LANDA-
23 RODRIGUEZ.

24 Overt Act No. 296: On October 22, 2014, co-conspirator Miguel
25 Rodriguez passed a message to defendant JOSE LANDA-RODRIGUEZ from
26 defendant RAFAEL LEMUS that Mexican Mafia members were in agreement
27 about stripping A.E. of his membership and taking over his
28 territories.

1 Overt Act No. 297: On November 11, 2014, an unknown co-
2 conspirator killed G.E. because of his alignment with A.E.
3 Defendant GABRIEL ZENDEJAS-CHAVEZ Used His Status as an Attorney to
4 Pass Messages About Mexican Mafia Business

5 Overt Act No. 298: On September 2, 2014, September 3, 2014, and
6 October 1, 2014, defendant GABRIEL ZENDEJAS-CHAVEZ used his status as
7 an attorney to visit ten Mexican Mafia members at Pelican Bay State
8 Prison, including Mexican Mafia member 4, and pass messages about new
9 Mexican Mafia members and about the identity of possible cooperators.

10 Overt Act No. 299: Between October 1, 2014, and October 22,
11 2014, after visiting Pelican Bay State Prison, defendant GABRIEL
12 ZENDEJAS-CHAVEZ reported to defendant RAFAEL LEMUS and co-conspirator
13 Miguel Rodriguez that: defendant GABRIEL ZENDEJAS-CHAVEZ had found
14 paperwork that co-conspirator Luis Garcia, unindicted co-conspirator
15 45 ("UICC-45"), and UICC-38 were cooperating with law enforcement;
16 Mexican Mafia Member 4 confirmed that "Cartoon" from the Canta Ranas
17 gang was now a Mexican Mafia member; and A.E. had been stripped of
18 his territories.

19 Overt Act No. 300: On or before October 22, 2014, co-
20 conspirator Miguel Rodriguez wrote a kite at the direction of DMM-2's
21 secretary, defendant RAFAEL LEMUS, stating that defendant GABRIEL
22 ZENDEJAS-CHAVEZ had found paperwork that co-conspirator Luis Garcia,
23 UICC-38, and UICC-45 were cooperating with law enforcement, that
24 "Cartoon" from the Canta Ranas gang was now an Eme member, that A.E.
25 had been stripped of his territories, and that the accompanying drugs
26 belonged to DMM-2 and Mexican Mafia member 13.

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1 Smuggling of Heroin and Mexican Mafia LACJ Enterprise Correspondence
2 into LACJ

3 Overt Act No. 301: On or before October 21, 2014, co-
4 conspirator Miguel Rodriguez directed unindicted co-conspirator Marco
5 Meza to smuggle drugs and a kite into LACJ on behalf of DMM-2.

6 Overt Act No. 302: On October 22, 2014, at the direction of co-
7 conspirator Miguel Rodriguez, unindicted co-conspirator Marco Meza
8 smuggled approximately 18.82 grams of heroin into LACJ on behalf of
9 the Mexican Mafia.

10 Overt Act No. 303: On October 22, 2014, unindicted co-
11 conspirator Marco Meza possessed a kite from co-conspirator Miguel
12 Rodriguez to defendant JOSE LANDA-RODRIGUEZ discussing Mexican Mafia
13 LACJ Enterprise business, including the identity of potential
14 cooperators as determined by defendant GABRIEL ZENDEJAS-CHAVEZ, the
15 identity of a new Mexican Mafia member, and the standing of other
16 Mexican Mafia members.

17 Possession of Heroin to be Smuggled into LACJ

18 Overt Act No. 304: On October 23, 2014, co-conspirator Miguel
19 Rodriguez possessed approximately 25.78 grams of heroin at his
20 residence with the intent to distribute it to other persons,
21 including by smuggling into LACJ.

22 Possession of Methamphetamine, Heroin, and Cocaine, Including to be
23 Smuggled into LACJ and Possession of a Firearm

24 Overt Act No. 305: On October 24, 2014, co-conspirator Ernesto
25 Vargas possessed approximately 601.2 grams of methamphetamine,
26 approximately 501.3 grams of heroin, approximately 83.4 grams of
27 cocaine, and approximately 1.4 grams of cocaine base in the form of
28 crack cocaine with the intent to distribute to others, including by

1 smuggling into LACJ, for the benefit of the Mexican Mafia LACJ
2 Enterprise.

3 Overt Act No. 306: On October 24, 2014, co-conspirator Ernesto
4 Vargas possessed a firearm, namely, a Kimber model Custom 2 .45
5 caliber pistol, and ammunition, in order to protect narcotics for the
6 benefit of the Mexican Mafia LACJ Enterprise.

7 Attorney GABRIEL ZENDEJAS-CHAVEZ Passes Mexican Mafia Messages

8 Overt Act No. 307: On October 30, 2014, defendant GABRIEL
9 ZENDEJAS-CHAVEZ visited Mexican Mafia member 11 at the ADX Florence
10 federal prison in Colorado and showed secret messages to Mexican
11 Mafia member 11.

12 Assaults of R.B. and M.G.

13 Overt Act No. 308: On August 22, 2015, in a recorded telephone
14 conversation, co-conspirator Genessis Blanco told unindicted co-
15 conspirator 48 ("UICC-48") to tell co-conspirator Andrew Pineda to
16 have R.B. assaulted because he was not recognizing the authority of
17 DMM-2 and was interfering with Mexican Mafia LACJ Enterprise
18 activities, including drug trafficking and extortion.

19 Overt Act No. 309: On August 22, 2015, in a recorded telephone
20 conversation, co-conspirator Andrew Pineda told co-conspirator
21 Genessis Blanco that M.G. was causing problems by not respecting the
22 authority of DMM-2 and interfering with Mexican Mafia LACJ Enterprise
23 activities, including drug trafficking and extortion.

24 Overt Act No. 310: On August 22, 2015, in a recorded telephone
25 conversation, co-conspirator Genessis Blanco told co-conspirator
26 Andrew Pineda to have M.G. assaulted because he was not recognizing
27 the authority of DMM-2 and was interfering with Mexican Mafia LACJ
28 Enterprise activities, including drug trafficking and extortion.

1 Overt Act No. 311: On August 22, 2015, co-conspirator Andrew
2 Pineda ordered that R.B. and M.G. be assaulted for not recognizing
3 the authority of DMM-2 and interfering with Mexican Mafia LACJ
4 Enterprise activities, including drug trafficking and extortion.

5 Overt Act No. 312: On August 23, 2015, unindicted co-
6 conspirators assaulted R.B. and M.G..

7 Overt Act No. 313: On and before October 23, 2015, co-
8 conspirator Genessis Blanco possessed records of the Mexican Mafia
9 LACJ Enterprises activities, including records of extortion and drug
10 trafficking.

11 Murder of P.C.

12 Overt Act No. 314: On April 5, 2015, in a recorded telephone
13 conversation, defendant ALVINO MUNOZ discussed a dispute over
14 neighborhood taxation and fines of Echo Park gang members with P.C.,
15 and P.C. told defendant ALVINO MUNOZ that he takes orders from
16 another Mexican Mafia member and would not talk to defendant ALVINO
17 MUNOZ about it, and would only talk to defendant JOSE LANDA-
18 RODRIGUEZ.

19 Overt Act No. 315: On April 5, 2015, in a recorded telephone
20 conversation, defendant ALVINO MUNOZ discussed with unindicted co-
21 conspirator 50 ("UICC-50") the dispute with P.C.

22 Overt Act No. 316: On April 27, 2015, defendant SAMANTHA RIVERA
23 initiated a three-way call from defendant JOSE LANDA-RODRIGUEZ to
24 Mexican Mafia member 14 and DMM-2, and in a recorded telephone
25 conversation, defendant JOSE LANDA-RODRIGUEZ discussed with Mexican
26 Mafia member 14 that defendant ALVINO MUNOZ had sent someone to
27 collect the fines of Echo Park gang members, but P.C. was interfering
28

1 with the collection of the fine and was disrespectful to defendant
2 ALVINO MUNOZ.

3 Overt Act No. 317: On April 27, 2015, in the three-way call
4 initiated by defendant SAMANTHA RIVERA, defendant JOSE LANDA-
5 RODRIGUEZ discussed with DMM-2 that P.C. was interfering in his
6 business and tried to push a "hard line" with defendant ALVINO MUNOZ.

7 Overt Act No. 318: On July 19, 2015, in a recorded telephone
8 conversation, defendant ALVINO MUNOZ and UICC-50 discussed that P.C.
9 had blocked the payment of a fine, UICC-50 stated that P.C. worked
10 for another Mexican Mafia member, and defendant ALVINO MUNOZ told
11 UICC-50 to shut down P.C.'s activities.

12 Overt Act No. 319: On July 19, 2015, in a recorded telephone
13 conversation, defendant JOSE LANDA-RODRIGUEZ told defendant SAMANTHA
14 RIVERA that P.C. is interfering and that defendant SAMANTHA RIVERA
15 and Mexican Mafia member 4 should talk to him.

16 Overt Act No. 320: On July 19, 2015, in coded language during a
17 recorded telephone conversations, UICC-9, on defendant JOSE LANDA-
18 RODRIGUEZ's orders, told unindicted co-conspirator 51 ("UICC-51") the
19 following: that P.C. was defying defendant JOSE LANDA-RODRIGUEZ; that
20 defendant JOSE LANDA-RODRIGUEZ was angry; to meet with P.C. and
21 "teach him a little lesson"; to tell P.C. to stay on his side of "the
22 bridge"; that P.C. was on the "Green Light" list; that defendant JOSE
23 LANDA-RODRIGUEZ wants P.C. "cut loose"; that defendant JOSE LANDA-
24 RODRIGUEZ' decision is "final"; that there will be punishment for
25 disregarding what defendant JOSE LANDA-RODRIGUEZ said; that UICC-51
26 should contact DMM-2 to confirm the order; and that defendant JOSE
27 LANDA-RODRIGUEZ was very angry, "pacing back and forth" and wanted to
28 teach P.C. a lesson.

1 Overt Act No. 321: On July 26, 2015, in a recorded telephone
2 conversation, UICC-9 told UICC-51 that defendant JOSE LANDA-RODRIGUEZ
3 put P.C. on the Green Light list and told UICC-51 to have an
4 unidentified co-conspirator lure P.C. in.

5 Overt Act No. 322: On November 21, 2015, unknown co-
6 conspirators shot and killed P.C.

7 Defendant RAFAEL LEMUS Assists DMM-2 in Running Mexican Mafia LACJ
8 Enterprise Business, Including Drug Trafficking and Extortion

9 Overt Act No. 323: Beginning in or prior to February 2014, and
10 continuing until at least May 2015, defendant RAFAEL LEMUS assisted
11 DMM-2 in running Mexican Mafia LACJ Enterprise business. Defendant
12 RAFAEL LEMUS assisted in obtaining drugs from Mexico and passed
13 messages from DMM-2 to others including to and from defendant GABRIEL
14 ZENDEJAS-CHAVEZ.

15 Overt Act No. 324: On February 11, 2015, in a recorded
16 telephone conversation, defendant RAFAEL LEMUS told an associate of
17 A.E. that the areas formerly controlled by A.E. now belonged to
18 defendant JOSE LANDA-RODRIGUEZ, DMM-2, and their associates.

19 Overt Act No. 325: On May 8, 2015, defendant RAFAEL LEMUS
20 possessed approximately \$11,500 and Mexican Mafia-related
21 correspondence at his residence.

22 Overt Act No. 326: On November 20, 2015, in a recorded
23 telephone conversation, defendant HECTOR DUARTE explained to UICC-5
24 the money he collected as a shot-caller in NCCF.

25 Overt Act No. 327: On November 20, 2015, UICC-5 connected
26 defendant RAFAEL LEMUS into a three-way call with defendant HECTOR
27 DUARTE.
28

1 Overt Act No. 328: On November 20, 2015, in a recorded
2 telephone conversation, defendant RAFAEL LEMUS told defendant HECTOR
3 DUARTE that he would investigate HECTOR DUARTE's "numbers," that is,
4 the amount of Mexican Mafia LACJ Enterprise drug trafficking and
5 extortion proceeds he forwarded, and asked HECTOR DUARTE if anyone
6 could verify his numbers.

7 Overt Act No. 329: On November 20, 2015, in a recorded
8 telephone conversation, defendant RAFAEL LEMUS told defendant HECTOR
9 DUARTE that UICC-5 is the "Senora" for DMM-2, that people should
10 listen to UICC-5, and that failure to recognize UICC-5 will result in
11 an assault.

12 Overt Act No. 330: On November 22, 2015, in a recorded
13 telephone conversation, defendant RAFAEL LEMUS told co-conspirator
14 Andrew Pineda and UICC-5 that co-conspirator Miguel Rodriguez has no
15 status with the Mexican Mafia LACJ Enterprise and that anyone using
16 co-conspirator Miguel Rodriguez's name will be assaulted.

17 Overt Act No. 331: On November 22, 2015, in a recorded
18 telephone conversation, defendant RAFAEL LEMUS stated that he has the
19 authority to appoint secretaries, that he appointed UICC-5, and that
20 anyone who gives UICC-5 trouble will "hear from him" and have
21 problems that follow them outside of LACJ.

22 Smuggling of Methamphetamine and Heroin into LACJ

23 Overt Act No. 332: From August 19, 2015, through September 1,
24 2015, defendant ALVINO MUNOZ and co-conspirator Kelly Jo Bell, and
25 unindicted co-conspirator Robert Ramirez, arranged to smuggle drugs
26 into LACJ for the benefit of defendant JOSE LANDA-RODRIGUEZ.

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1 Overt Act No. 333: On August 19, 2015, in a recorded telephone
2 conversation, defendant ALVINO MUNOZ and co-conspirator Kelly Jo Bell
3 discussed smuggling drugs into LACJ.

4 Overt Act No. 334: On August 28, 2015, in a recorded telephone
5 conversation, co-conspirator Kelly Jo Bell told defendant ALVINO
6 MUNOZ that she was on her way to deliver drugs to the individual who
7 would smuggle them into LACJ.

8 Overt Act No. 335: On August 28, 2015, co-conspirator Kelly Jo
9 Bell delivered approximately 41.8 grams of methamphetamine to
10 unindicted co-conspirator Alejandro Martinez to smuggle into LACJ for
11 defendant JOSE LANDA-RODRIGUEZ.

12 Overt Act No. 336: On September 1, 2015, in a recorded
13 telephone conversation, unindicted co-conspirator Robert Ramirez
14 discussed with another unindicted co-conspirator the fact that
15 unindicted co-conspirator Alejandro Martinez had the drugs to be
16 smuggled into LACJ for defendant JOSE LANDA-RODRIGUEZ.

17 Overt Act No. 337: On August 30, 2015, unindicted co-
18 conspirator Alejandro Martinez possessed approximately 41.8 grams of
19 methamphetamine and 61.83 grams of heroin inside his body and got
20 himself arrested in order to bring the methamphetamine and heroin
21 into LACJ.

22 Overt Act No. 338: On September 1, 2015, in a recorded
23 telephone conversation, co-conspirator Kelly Jo Bell learned that an
24 unindicted co-conspirator inside LACJ knew about unindicted co-
25 conspirator Alejandro Martinez smuggling drugs into LACJ, had located
26 unindicted co-conspirator Alejandro Martinez , and would keep co-
27 conspirator Kelly Jo Bell updated as to the status of the drugs.
28

1 Overt Act No. 339: On October 14, 2015, co-conspirator Kelly Jo
2 Bell possessed approximately 12.0 grams of methamphetamine and
3 ledgers regarding Mexican Mafia LACJ Enterprise business.

4 Assault of C.G. for Interfering with Drug Trafficking and Extortion

5 Overt Act No. 340: On January 16, 2016, in a recorded telephone
6 call, defendant MARK LANDEROS and UICC-6 discussed having C.G.
7 assaulted in retaliation for C.G. attempting to take control of LACJ
8 away from defendant JOSE LANDA-RODRIGUEZ.

9 Overt Act No. 341: On January 16, 2016, in a recorded telephone
10 call, at defendant MARK LANDEROS' direction, UICC-6 called an
11 unindicted co-conspirator and relayed defendant MARK LANDEROS' order
12 that C.G. was to be assaulted.

13 Overt Act No. 342: On January 16, 2016, in a recorded telephone
14 call, UICC-6 relayed an unindicted co-conspirator's message that C.G.
15 was working under the orders of other Mexican Mafia members.

16 Overt Act No. 343: On January 16, 2016, UICC-6 relayed a
17 message to UICC-16 that C.G. was to be assaulted under the authority
18 of defendant JOSE LANDA-RODRIGUEZ for interfering with Mexican Mafia
19 LACJ Enterprise operations, including drug trafficking and extortion.

20 Overt Act No. 344: On January 16, 2016, in a recorded telephone
21 call, UICC-16 relayed the order that C.G. was to be assaulted to
22 UICC-12, a shot-caller in LACJ.

23 Overt Act No. 345: On January 26, 2016, on the orders from
24 defendant MARK LANDEROS and UICC-12, unindicted co-conspirators
25 assaulted C.G. at the direction of the Mexican Mafia LACJ Enterprise.

26 G. SPECIAL SENTENCING ALLEGATIONS

27 11. Beginning on a date unknown to the Grand Jury, and
28 continuing until at least March 29, 2018, in Los Angeles County,

1 within the Central District of California, and elsewhere, defendants
2 JOSE LANDA-RODRIGUEZ, GABRIEL ZENDEJAS-CHAVEZ, RAFAEL LEMUS, ALVINO
3 MUNOZ, HECTOR DUARTE, SAMANTHA RIVERA, MARK LANDEROS, CECILIA VIRGEN,
4 NANCY DUARTE, VALENTIN CORDOVA, DAVID BERNARDINO, MIRIAM MEZA, ANA
5 MARTINEZ, and ADRIAN ARAIZA, and others known and unknown to the
6 Grand Jury, conspired and agreed with each other to knowingly and
7 intentionally (i) distribute, and (ii) possess with intent to
8 distribute:

9 a. at least 500 grams of a mixture and substance
10 containing a detectable amount of methamphetamine, a Schedule II
11 controlled substance, in violation of Title 21, United States Code,
12 Sections 846, 841(a)(1) and (b)(1)(A)(viii);

13 b. at least 50 grams of methamphetamine, a Schedule II
14 controlled substance, in violation of Title 21, United States Code,
15 Sections 846, 841(a)(1) and (b)(1)(A)(viii);

16 c. at least a kilogram of a mixture and substance
17 containing a detectable amount of heroin, a Schedule I narcotic drug
18 controlled substance, in violation of Title 21, United States Code,
19 Sections 846, 841(a)(1) and (b)(1)(A)(i).

20 12. On or about December 16, 2013, in Los Angeles County,
21 within the Central District of California, defendants JOSE LANDA-
22 RODRIGUEZ and others unknown to the Grand Jury conspired unlawfully
23 to kill J.B.-2 with malice aforethought, in violation of California
24 Penal Code Sections 182 and 187.

25 13. From on or about April 5, 2015, through on or about
26 November 21, 2015, in Los Angeles County, within the Central District
27 of California, defendants JOSE LANDA-RODRIGUEZ and others unknown to
28 the Grand Jury conspired unlawfully to kill P.C. with malice

1 aforethought, in violation of California Penal Code Sections 182 and
2 187.

3 14. On or about April 22, 2014, in Los Angeles and San
4 Bernardino Counties, within the Central District of California,
5 defendant DAVID DIAZ unlawfully conspired to kill C.R. with malice
6 aforethought, in violation of California Penal Code Sections 182 and
7 187.

COUNT TWO

[18 U.S.C. §§ 1959(a)(3), 2]

[DEFENDANTS MARK LANDEROS AND JUAN LEONARD GARCIA]

1. Paragraphs 1 through 13 of the General Allegations of this First Superseding Indictment and paragraphs 2 through 6 of Count One are hereby re-alleged and incorporated by reference as though fully set forth herein.

2. At all times relevant to this First Superseding Indictment, the Mexican Mafia LACJ Enterprise including its leaders, members, and associates, constituted an "enterprise," as defined by Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact, although not a legal entity, which is engaged in, and the activities of which affected, interstate and foreign commerce. The Mexican Mafia LACJ Enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

3. At all times relevant to this First Superseding Indictment, the Mexican Mafia LACJ Enterprise, through its members and associates, engaged in racketeering activity, as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), consisting of:

multiple acts involving:

a. Murder, in violation of California Penal Code Sections 21a, 31, 182, 187, 189, and 664;

b. Kidnapping, in violation of California Penal Code Sections 21a, 31, 182, 207, 209, and 664;

c. Robbery, in violation of California Penal Code Sections 21a, 31, 182, 211, 212, 212.5, 213, 215, and 664;

1 d. Extortion, in violation of California Penal Code
2 Sections 21a, 31, 182, 518, 519, 524, and 664;

3 multiple offenses involving:

4 e. the distribution of, possession with intent to
5 distribute, and conspiracy to possess with intent to distribute and
6 distribute controlled substances, including methamphetamine, heroin,
7 cocaine, cocaine base, and marijuana, in violation of Title 21,
8 United States Code, Sections 841(a)(1) and 846;

9 and multiple acts indictable under the following provisions of
10 federal law:

11 f. Title 18, United States Code, Section 1512, Tampering
12 with a Witness;

13 g. Title 18, United States Code, Section 1513,
14 Retaliating against a witness;

15 h. Title 18, United States Code, Sections 1956 and 1957,
16 Money Laundering;

17 i. Title 18, United States Code, Section 1028, Identity
18 Fraud; and

19 j. Title 18, United States Code, Section 1029, Access
20 Device Fraud.

21 4. On or about March 31, 2013, in Los Angeles County, within
22 the Central District of California, for the purpose of maintaining
23 and increasing position in the Mexican Mafia LACJ Enterprise, an
24 enterprise engaged in racketeering activity, defendants MARK
25 LANDEROS, aka "Smokey," aka "Troy," aka "Hot," and JUAN LEONARD
26 GARCIA, aka "Little John," aka "Trevor," unlawfully and knowingly
27 assaulted A.R. with a dangerous weapon, which assault resulted in
28

1 serious bodily injury, in violation of California Penal Code Sections
2 31, 245(a)(1) and (4).

COUNT THREE

[18 U.S.C. §§ 1959(a)(1), 2(a)]

[DEFENDANT DAVID DIAZ]

1. Paragraphs 1 through 13 of the General Allegations of this First Superseding Indictment, paragraphs 2 through 6 of Count One, and Paragraphs 2 and 3 of Count Two of this First Superseding Indictment are hereby re-alleged and incorporated by reference as though fully set forth herein.

2. On or about April 22, 2014, in Los Angeles and San Bernardino Counties, within the Central District of California, for the purpose of maintaining and increasing position in the Mexican Mafia LACJ Enterprise, an enterprise engaged in racketeering activity, defendant DAVID DIAZ, aka "Stomps," unlawfully and knowingly kidnapped C.R., in violation of California Penal Code Sections 31, 207.

COUNT FOUR

[18 U.S.C. § 1959(a)(5)]

[DEFENDANT DAVID DIAZ]

1. Paragraphs 1 through 13 of the General Allegations of this First Superseding Indictment, paragraphs 2 through 6 of Count One, and Paragraphs 2 and 3 of Count Two of this First Superseding Indictment are hereby re-alleged and incorporated by reference as though fully set forth herein.

2. On or about April 22, 2014, in Los Angeles and San Bernardino Counties, within the Central District of California, for the purpose of maintaining and increasing position in the Mexican Mafia LACJ Enterprise, an enterprise engaged in racketeering activity, defendant DAVID DIAZ, aka "Stomps," and others known and unknown to the Grand Jury, unlawfully and knowingly conspired to kidnap C.R., in violation of California Penal Code Sections 182 and 207.

COUNT FIVE

[21 U.S.C § 846]

[DEFENDANTS JOSE LANDA-RODRIGUEZ, GABRIEL ZENDEJAS-CHAVEZ, RAFAEL LEMUS, ALVINO MUNOZ, HECTOR DUARTE, SAMANTHA RIVERA, MARK LANDEROS, CECILIA VIRGEN, NANCY DUARTE, VALENTIN CORDOVA, DAVID BERNARDINO, MIRIAM MEZA, ANA MARTINEZ, ADRIAN ARAIZA, ROBERT RAMIREZ, BRYANNA MCCULLAH, AND JUAN NMN GARCIA]

1. Paragraphs 1 through 13 of the General Allegations of this First Superseding Indictment, and paragraphs 2 through 6 of Count One of this First Superseding Indictment, are re-alleged and incorporated by reference as though fully set forth herein.

A. OBJECTS OF THE CONSPIRACY

2. Beginning on a date unknown to the Grand Jury and continuing until at least March 29, 2018, in Los Angeles and San Bernardino Counties, within the Central District of California, and elsewhere, defendants JOSE LANDA-RODRIGUEZ, aka "Jose Rodriguez-Landa," aka "Jose Landa," aka "Jose Rodriguez," aka "Fox," aka "Fox Tapia," aka "F-X," aka "Alejandro Tapia," aka "Cola Rojo," aka "Red Tail," aka "Pops," aka "Tio," aka "The General," aka "Taras," aka "The Old Man," aka "The Animal," aka "Old School," GABRIEL ZENDEJAS-CHAVEZ, aka "Corbatas," RAFAEL LEMUS, aka "Ere," aka "The Voice," aka "La Voz," ALVINO MUNOZ, aka "Bino," aka "B," HECTOR DUARTE, aka "Lil Man," aka "Hecko," SAMANTHA RIVERA, aka "Sam," aka "S," MARK LANDEROS, aka "Smokey," aka "Troy," aka "Hot," CECILIA VIRGEN, aka "Cecilia DeLeon," aka "Sessy," aka "Hazel," aka "Gia," aka "Sky," aka "Hooker," NANCY DUARTE, aka "Pink," VALENTIN CORDOVA, aka "Teen," DAVID BERNARDINO, aka "Downer," MIRIAM MEZA, ANA MARTINEZ, aka "Ana America," aka "Bandit," ADRIAN ARAIZA, aka "Chemo," ROBERT RAMIREZ,

1 aka "Wiz," BRYANNA MCCULLAH, aka "Bee Bee," and JUAN NMN GARCIA, aka
2 "Trouble," and others known and unknown to the Grand Jury, conspired
3 and agreed with each other to knowingly and intentionally distribute,
4 and possess with intent to distribute, the following controlled
5 substances:

6 a. at least 500 grams of a mixture and substance
7 containing a detectable amount of methamphetamine, a Schedule II
8 controlled substance, in violation of Title 21, United States Code,
9 Sections 841(a)(1) and (b)(1)(A)(viii);

10 b. at least 50 grams of methamphetamine, a Schedule II
11 controlled substance, in violation of Title 21, United States Code,
12 Sections 841(a)(1) and (b)(1)(A)(viii);

13 c. at least 100 grams of a mixture and substance
14 containing a detectable amount of heroin, a Schedule I narcotic drug
15 controlled substance, in violation of Title 21, United States Code,
16 Sections 841(a)(1) and (b)(1)(B)(i);

17 d. cocaine, a Schedule II narcotic drug controlled
18 substance, in violation of Title 21, United States Code, Sections
19 841(a)(1) and (b)(1)(C); and

20 e. marijuana, a Schedule I controlled substance, in
21 violation of Title 21, United States Code, Sections 841(a)(1) and
22 (b)(1)(D).

23 B. MEANS BY WHICH THE OBJECTS OF THE CONSPIRACY WERE TO BE
24 ACCOMPLISHED

25 3. Paragraph 9 of Count One of this First Superseding
26 Indictment is re-alleged and incorporated by reference as if fully
27 set forth herein.
28

1 C. OVERT ACTS

2 4. On or about the following dates, in furtherance of the
3 conspiracy, and to accomplish the object of the conspiracy,
4 defendants JOSE LANDA-RODRIGUEZ, GABRIEL ZENDEJAS-CHAVEZ, RAFAEL
5 LEMUS, ALVINO MUNOZ, HECTOR DUARTE, SAMANTHA RIVERA, MARK LANDEROS,
6 CECILIA VIRGEN, NANCY DUARTE, VALENTIN CORDOVA, DAVID BERNARDINO,
7 MIRIAM MEZA, ANA MARTINEZ, ADRIAN ARAIZA, ROBERT RAMIREZ, BRYANNA
8 MCCULLAH, and JUAN NMN GARCIA, and others known and unknown to the
9 Grand Jury, committed and caused to be committed various overt acts
10 within the Central District of California, and elsewhere, including,
11 but not limited to, Overt Acts numbered 1 through 345 as set forth in
12 Section F of Count One of this First Superseding Indictment, which
13 are re-alleged and incorporated by reference as if fully set forth
14 herein, in addition to the following:

15 Smuggling of Heroin and Methamphetamine into LACJ

16 Overt Act No. 346: From December 19, 2012, through January 22,
17 2013, defendant CECILIA VIRGEN and co-conspirator Jose Flores, UICC-
18 3, and UICC-23, arranged to smuggle approximately 64.6 grams of
19 heroin and approximately 36.7 grams of methamphetamine into LACJ on
20 behalf of DMM-1.

21 Overt Act No. 347: On January 19, 2013, at defendant CECILIA
22 VIRGEN's direction, UICC-23 possessed and smuggled in his body at
23 least 64.6 grams of heroin and 36.7 grams of methamphetamine into
24 LACJ for DMM-1.

25 Overt Act No. 348: On January 22, 2013, UICC-23 gave an unknown
26 amount of a controlled substance to UICC-3 in LACJ.

27 //

28 //

1 Smuggling of Methamphetamine, Heroin, and Marijuana into LACJ

2 Overt Act No. 349: From January 22, 2013, through February 28,
3 2013, co-conspirator Richard Griego arranged with defendant CECILIA
4 VIRGEN and co-conspirators Valerie Trejo and Richard Bailey, for
5 heroin, methamphetamine, and marijuana to be smuggled to UICC-3 in
6 LACJ on behalf of DMM-1.

7 Overt Act No. 350: On February 28, 2013, co-conspirator Richard
8 Griego possessed in his body and attempted to smuggle approximately
9 26.2 grams of pure methamphetamine, approximately 62.9 grams of
10 heroin, and approximately 11.75 grams of marijuana into LACJ for
11 UICC-3 and DMM-1.

12 Smuggling of Methamphetamine into LACJ

13 Overt Act No. 351: From July 24, 2013, through August 14, 2013,
14 co-conspirator Jonathan Rodriguez arranged with defendants MARK
15 LANDEROS, BRYANNA MCCULLAH, and JUAN NMN GARCIA, and co-conspirator
16 Kristen Ayala, and UICC-31, to smuggle approximately one ounce of
17 methamphetamine and one ounce of marijuana into LACJ.

18 Overt Act No. 352: On July 25, 2013, in a recorded telephone
19 conversation, co-conspirator Kristen Ayala advised UICC-31 on what to
20 do when he arrived at LACJ with the smuggled drugs.

21 Overt Act No. 353: On August 3, 2013, in a recorded telephone
22 conversation between defendants MARK LANDEROS and JUAN NMN GARCIA,
23 and co-conspirator Kristen Ayala, defendant JUAN NMN GARCIA agreed to
24 supply methamphetamine and marijuana for defendant MARK LANDEROS, and
25 gave prices for the drugs.

26 Overt Act No. 354: On August 3, 2014, defendant JUAN NMN GARCIA
27 provided approximately one ounce of methamphetamine to co-conspirator
28

1 Kristen Ayala so that the methamphetamine could be smuggled into LACJ
2 on behalf of defendant MARK LANDEROS.

3 Overt Act No. 355: On August 3, 2014, co-conspirator Kristen
4 Ayala obtained and packaged approximately one ounce of methamphetamine
5 so that it could be smuggled into LACJ on behalf of defendant MARK
6 LANDEROS.

7 Overt Act No. 356: From August 4, 2013, through August 12,
8 2013, UICC-31 possessed approximately one ounce of methamphetamine
9 for the purpose of smuggling it into LACJ on behalf of defendant MARK
10 LANDEROS.

11 Overt Act No. 357: On August 13, 2013, defendant BRYANNA
12 MCCULLAH possessed approximately one ounce of methamphetamine and
13 gave that methamphetamine to co-conspirator Jonathan Rodriguez, with
14 the intent that it be smuggled into LACJ on behalf of defendant MARK
15 LANDEROS.

16 Overt Act No. 358: On August 13, 2013, in a recorded telephone
17 conversation, co-conspirator Jonathan Rodriguez agreed with defendant
18 MARK LANDEROS to smuggle drugs into LACJ.

19 Overt Act No. 359: On August 14, 2013, co-conspirator Jonathan
20 Rodriguez possessed approximately 22.7 grams of methamphetamine in in
21 his body which was discovered and seized by LASD deputies.

22 Smuggling of Methamphetamine and Marijuana into LACJ via Kidney
23 Dialysis Center

24 Overt Act No. 360: On September 21, 2013, co-conspirator
25 Jonathan Mendez attempted to smuggle approximately 51.29 grams of
26 marijuana and 13.2 grams of methamphetamine that had been left in a
27 kidney dialysis center by an unknown co-conspirator.

1 Possession of Heroin Within LACJ and Extortion

2 Overt Act No. 361: On or before December 18, 2013, co-
3 conspirator Jonathan Rodriguez agreed to smuggle approximately 43.7
4 grams of heroin inside Twin Towers for UICC-2 and defendant LUIS
5 GARCIA.

6 Overt Act No. 362: On December 18, 2013, in Twin Towers, co-
7 conspirator Jonathan Rodriguez, intending to distribute the drugs to
8 others on behalf of defendant JOSE LANDA-RODRIGUEZ, possessed
9 approximately 43.7 grams of heroin which was discovered and seized by
10 LASD deputies.

11 Smuggling of Drugs in LACJ

12 Overt Act No. 363: Between April 18, 2014, and April 20, 2014,
13 co-conspirator Frank Herrera, on behalf of co-conspirators Donato
14 Gonzalez and Alvaro Ruiz, obtained methamphetamine and heroin for the
15 purpose of having it smuggled into LACJ.

16 Overt Act No. 364: From April 20, 2014, through April 22, 2014,
17 an co-conspirator Ramon Amaya smuggled approximately 2.37 grams of
18 heroin and 7.75 grams of methamphetamine into LACJ inside his body,
19 with the intent to distribute the drugs within LACJ.

20 Overt Act No. 365: On April 22, 2014, co-conspirator Martin
21 Salazar possessed approximately 2.37 grams of heroin and 7.75 grams
22 of methamphetamine that had been smuggled into LACJ by co-conspirator
23 Ramon Amaya in order to secrete the drugs from LASD deputies and to
24 further distribute the drugs within LACJ.

25 Smuggling of Heroin into LACJ

26 Overt Act No. 366: On or before October 22, 2014, co-
27 conspirator Marco Meza agreed with co-conspirator Miguel Rodriguez to
28 smuggle heroin into LACJ.

1 Overt Act No. 367: On October 22, 2014, at the direction of co-
2 conspirator Miguel Rodriguez, co-conspirator Marco Meza smuggled
3 approximately 18.82 grams of heroin into LACJ on behalf of defendant
4 JOSE LANDA-RODRIGUEZ.

5 Overt Act No. 368: On October 22, 2014, co-conspirator Marco
6 Meza called co-conspirator Miguel Rodriguez to report that he had
7 arrived at LACJ with the heroin he had smuggled in.

8 Smuggling of Methamphetamine and Heroin into LACJ

9 Overt Act No. 369: On August 19, 2015, in a recorded telephone
10 conversation, defendant ALVINO MUNOZ discussed smuggling drugs into
11 LACJ with co-conspirator Kelly Jo Bell.

12 Overt Act No. 370: On September 1, 2015, in a recorded
13 telephone conversation, defendant ROBERT RAMIREZ spoke to an
14 unidentified unindicted co-conspirator who told defendant ROBERT
15 RAMIREZ that co-conspirator Alejandro Martinez had the drugs to be
16 smuggled into LACJ for defendant JOSE LANDA-RODRIGUEZ.

17 Overt Act No. 371: On September 1, 2015, in a recorded
18 telephone conversation, defendant ROBERT RAMIREZ told co-conspirator
19 Kelly Jo Bell that he got the message about co-conspirator Alejandro
20 Martinez smuggling drugs into LACJ, that he located co-conspirator
21 Alejandro Martinez right away, and that he would keep co-conspirator
22 Kelly Jo Bell updated as to the status of the drugs.

23 Overt Act No. 372: On September 1, 2015, co-conspirator
24 Alejandro Martinez, having smuggled drugs into LACJ, possessed,
25 inside his body, approximately 41.8 grams of methamphetamine and
26 61.83 grams of heroin, which was discovered and seized by LASD
27 deputies.

1 D. SENTENCING ALLEGATION

2 Prior to committing the offense alleged in this Count, defendant
3 VALENTIN CORDOVA had been finally convicted of a serious drug felony
4 as that term is defined and used in Title 21, United States Code,
5 Sections 802(57), 841, and 851, namely, on or about November 15,
6 2020, in the United States District Court for the Central District of
7 California, case number CR 07-01079-DSF, defendant CORDOVA was
8 convicted of Conspiracy to Possess With Intent to Distribute Cocaine,
9 in violation of Title 21, United States Code, Section 846, for which
10 defendant CORDOVA served a term of imprisonment of more than 12
11 months. Defendant CORDOVA was released from a term of imprisonment
12 for that offense within 15 years of the commencement of the offense
13 alleged in Count Five of this First Superseding Indictment.

COUNT SIX

[21 U.S.C. §§ 841(a)(1), (b)(1)(B)(viii); 18 U.S.C. § 2]

[DEFENDANTS MARK LANDEROS, JUAN NMN GARCIA, AND BRYANNA MCCULLAH]

On or about August 14, 2013, in Los Angeles County, within the Central District of California, defendants MARK LANDEROS, aka "Smokey," aka "Troy," aka "Hot," JUAN NMN GARCIA, aka "Trouble," and BRYANNA MCCULLAH, aka "Bee Bee," knowingly and intentionally aided, abetted, counseled, commanded, induced and procured, and willfully caused, another person to knowingly and intentionally possess with intent to distribute at least five grams, that is, approximately 22.7 grams, of methamphetamine, a Schedule II controlled substance.

COUNT SEVEN

[21 U.S.C. §§ 841(a)(1), (b)(1)(B)(viii); 18 U.S.C. § 2]

[DEFENDANT GABRIEL ZENDEJAS-CHAVEZ]

On or about April 22, 2014, in Los Angeles County, within the Central District of California, defendant GABRIEL ZENDEJAS-CHAVEZ, aka "Corbatas," knowingly and intentionally aided, abetted, counseled, commanded, induced and procured, and willfully caused, other persons to knowingly and intentionally possess with intent to distribute at least five grams, that is, approximately 7.75 grams, of methamphetamine, a Schedule II controlled substance.

COUNT EIGHT

[21 U.S.C. §§ 841(a)(1), (b)(1)(C); 18 U.S.C. § 2]

[DEFENDANT GABRIEL ZENDEJAS-CHAVEZ]

On or about April 22, 2014, in Los Angeles County, within the Central District of California, defendant GABRIEL ZENDEJAS-CHAVEZ, aka "Corbatas," knowingly and intentionally aided, abetted, counseled, commanded, induced and procured, and willfully caused, other persons to knowingly and intentionally possess with intent to distribute approximately 2.37 grams of a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic drug controlled substance.

COUNT NINE

[21 U.S.C. §§ 841(a)(1), (b)(1)(B)(viii); 18 U.S.C. § 2]

[DEFENDANTS ALVINO MUNOZ AND ROBERT RAMIREZ]

On or about September 1, 2015, in Los Angeles County, within the Central District of California, defendants ALVINO MUNOZ, aka "Bino," aka "B," and ROBERT RAMIREZ, aka "Wiz," knowingly and intentionally aided, abetted, counseled, commanded, induced and procured, and willfully caused, another person to knowingly and intentionally possessed with intent to distribute at least five grams, that is, approximately 41.8 grams, of methamphetamine, a Schedule II controlled substance.

COUNT TEN

[21 U.S.C. §§ 841(a)(1), (b)(1)(C); 18 U.S.C. § 2]

[DEFENDANTS ALVINO MUNOZ AND ROBERT RAMIREZ]

On or about September 1, 2015, in Los Angeles County, within the Central District of California, defendants ALVINO MUNOZ, aka "Bino," aka "B," and ROBERT RAMIREZ, aka "Wiz," knowingly and intentionally aided, abetted, counseled, commanded, induced and procured, and willfully caused, another person to knowingly and intentionally possess with intent to distribute approximately 61.83 grams of a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic drug controlled substance.

COUNT ELEVEN

[18 U.S.C. §§ 1956(a)(1)(A)(i), 2(b)]

[DEFENDANT ANA MARTINEZ]

On or about May 25, 2013, in Los Angeles County, within the Central District of California, and elsewhere, defendant ANA MARTINEZ, aka "Ana America," aka "Bandit," knowing that the property involved represented the proceeds of some form of unlawful activity, conducted and willfully caused others to conduct a financial transaction affecting interstate and foreign commerce, namely, the conversion to cash of \$500 of money orders, representing the proceeds of extortion and a conspiracy to distribute controlled substances, which transaction, in fact, involved the proceeds of specified unlawful activity, that is, Extortion, in violation of California Penal Code Sections 21(a), 31, 182, 518, 519, 524, and 664, and Conspiracy to Distribute Controlled Substances, in violation of Title 21, United States Code, Section 846, with the intent to promote the carrying on of such specified unlawful activity.

COUNT TWELVE

[18 U.S.C. § 1029(a)(3)]

[DEFENDANT ANA MARTINEZ]

On or about August 7, 2013, in Los Angeles County, within the Central District of California, defendant ANA MARTINEZ, aka "Ana America," aka "Bandit," knowingly and with intent to defraud, possessed at least fifteen unauthorized access devices (as defined in Title 18, United States Code, Sections 1029(e)(1) and (3)), namely, approximately 725 social security numbers belonging to persons other than defendant ANA MARTINEZ, along with dates of birth and names of persons other than defendant ANA MARTINEZ, with said possession affecting interstate and foreign commerce.

COUNT THIRTEEN

[18 U.S.C. § 1028A(a)(1)]

[DEFENDANT ANA MARTINEZ]

On or about August 7, 2013, in Los Angeles County, within the Central District of California, defendant ANA MARTINEZ, aka "Ana America," aka "Bandit," knowingly possessed, without legal authority, means of identification that defendant ANA MARTINEZ knew belonged to another person, that is, a social security number and date of birth belonging to M.V., during and in relation to a felony violation of Title 18, United States Code, Section 1029(a)(3), Possession of at least Fifteen Unauthorized Access Devices, as charged in Count Twelve of this First Superseding Indictment.

FORFEITURE ALLEGATION ONE

[18 U.S.C. § 1963]

1. Pursuant to Federal Rule of Criminal Procedure 32.2, notice is hereby given that the United States of America will seek forfeiture as part of any sentence, pursuant to Title 18, United States Code, Section 1963, and Title 28 United States Code, Section 2461(c), in the event of any defendant's conviction of the offense set forth in Count One of this First Superseding Indictment.

2. Any defendant so convicted shall forfeit to the United States of America the following:

(a) Any interest the defendant has acquired or maintained as a result of such offense;

(b) Any interest in, security of, claim against, or property or contractual right of any kind affording a source or influence over, any enterprise which the defendant has established, operated, controlled, conducted, or participated in the conduct of, as a result of such offense;

(c) Any property constituting, or derived from, any proceeds which the defendant obtained, directly or indirectly, from racketeering activity as a result of such offense.

3. To the extent such property is not available for forfeiture, any defendant so convicted shall forfeit to the United States of America a sum of money equal to the total value of the property described in subparagraphs 2(a), 2(b), and 2(c).

4. Pursuant to Title 18, United States Code, Section 1963(m), any defendant so convicted shall forfeit substitute property, up to the total value of the property described in the preceding paragraph if, as the result of any act or omission of said defendant, the

1 property described in the preceding paragraph, or any portion thereof
2 (a) cannot be located upon the exercise of due diligence; (b) has
3 been transferred, sold to or deposited with a third party; (c) has
4 been placed beyond the jurisdiction of the court; (d) has been
5 substantially diminished in value; or (e) has been commingled with
6 other property that cannot be divided without difficulty.

FORFEITURE ALLEGATION TWO

[21 U.S.C. § 853]

1. Pursuant to Rule 32.2(a) of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence, pursuant to Title 21, United States Code, Section 853 and Title 28, United States Code, Section 2461(c), in the event of any defendant's conviction of the offenses set forth in any of Counts Five through Ten of this First Superseding Indictment.

2. Any defendant so convicted shall forfeit to the United States of America the following:

(a) All right, title and interest in any and all property, real or personal, constituting or derived from, any proceeds which the defendant obtained, directly or indirectly, from any such offense;

(b) All right, title and interest in any and all property, real or personal, used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of any such offense; and

(c) To the extent such property is not available for forfeiture, a sum of money equal to the total value of the property described in subparagraphs (a) and (b).

3. Pursuant to Title 21, United States Code, Section 853(p), any defendant so convicted shall forfeit substitute property if, by any act or omission of said defendant, the property described in the preceding paragraph, or any portion thereof: (a) cannot be located upon the exercise of due diligence; (b) has been transferred, sold to, or deposited with a third party; (c) has been placed beyond the

1 jurisdiction of the court; (d) has been substantially diminished in
2 value; or (e) has been commingled with other property that cannot be
3 divided without difficulty.

FORFEITURE ALLEGATION THREE

[18 U.S.C. § 982]

1. Pursuant to Rule 32.2(a) of the Federal Rules of Criminal Procedure, notice is hereby given that the United States will seek forfeiture as part of any sentence, pursuant to Title 18, United States Code, Section 982(a)(1), in the event of the defendant's conviction of the offense set forth in Count Eleven of this First Superseding Indictment.

2. The defendant, if so convicted, shall forfeit to the United States of America any property, real or personal, involved in such offense, and any property traceable to such property.

3. To the extent such property is not available for forfeiture, the defendant, if so convicted, shall forfeit to the United States of America a sum of money equal to the total value of the property described in paragraph 2.

4. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1), and Title 18, United States Code, Section 982(b)(2), the defendant, if so convicted, shall forfeit substitute property, if, by any act or omission of the defendant, the property described in the preceding paragraph, or any portion thereof: (a) cannot be located upon the exercise of due diligence; (b) has been transferred, sold to, or deposited with a third party; (c) has been placed beyond the jurisdiction of the court; (d) has been substantially diminished in value; or (e) has been commingled with other property that cannot be divided without difficulty. Substitution of assets shall not be ordered, however, where the convicted defendant acted merely as an intermediary who handled but did not retain the property in the

1 course of the money laundering offense unless the defendant, in
2 committing the offense or offenses giving rise to the forfeiture,
3 conducted three or more separate transactions involving a total of
4 \$100,000.00 or more in any twelve-month period.

FORFEITURE ALLEGATION FOUR

[18 U.S.C. §§ 982 and 1029]

1. Pursuant to Rule 32.2(a) of the Federal Rules of Criminal Procedure, notice is hereby given that the United States will seek forfeiture as part of any sentence, pursuant to Title 18, United States Code, Sections 982(a)(2) and 1029, in the event of the defendant's conviction of the offenses set forth in either of Counts Twelve or Thirteen of this First Superseding Indictment.

2. The defendant, if so convicted, shall forfeit to the United States of America the following:

(a) All right, title, and interest in any and all property, real or personal, constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of the offense;

(b) Any personal property used or intended to be used to commit the offense.

3. To the extent such property is not available for forfeiture, the defendant, if so convicted, shall forfeit to the United States of America a sum of money equal to the total value of the property described in subparagraphs 2(a) and 2(b).

4. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Sections 982(b)(1) and 1029(c)(2), the defendant, if so convicted, shall forfeit substitute property, up to the total value of the property described in the preceding paragraph if, as the result of any act or omission of the defendant, the property described in the preceding paragraph, or any portion thereof: (a) cannot be located upon the exercise of due diligence; (b) has been transferred, sold to or deposited with a

1 third party; (c) has been placed beyond the jurisdiction of the
2 court; (d) has been substantially diminished in value; or (e) has
3 been commingled with other property that cannot be divided without
4 difficulty.

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6 A TRUE BILL

7
8 /S/

9 Foreperson

10 TRACY L. WILKISON
11 United States Attorney

12 

13 SCOTT M. GARRINGER
14 Assistant United States Attorney
15 Chief, Criminal Division

16 SHAWN J. NELSON
17 Assistant United States Attorney
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